

LONDON BOROUGH OF BROMLEY

Air Quality Action Plan

2027 to 2031



DRAFT FOR CONSULTATION

Responsibilities and commitment

This Air Quality Action Plan (AQAP) has been developed by the Environmental Protection Team within Public Protection at Bromley Council, working collaboratively with a wide range of officers and departments whose support and shared commitment have shaped this council wide strategy. This includes:

- Ade Adetosoye CBE, Chief Executive
- Dr Nada Lemic, Director of Public Health
- Dan Jones, Director of Environment and Public Protection
- Louise Watkinson, Assistant Director of Public Protection
- Hannah Jackson, Assistant Director, Environment (Greenspace & Business Services)
- Peter McCready, Assistant Director of Environment
- Angus Culverwell, Assistant Director of Traffic and Parking
- Public Protection
- Public Health
- Transport Planning
- Traffic Engineering & Parking Design
- Transport Operations
- Neighbourhood Management
- Waste Services
- Road Safety & Travel Planning
- Highways
- Planning
- Building Control
- Procurement
- Green Space
- Carbon Management
- Public Affairs Team

The AQAP will be subject to an annual review. Progress each year will be reported in the Annual Status Report, submitted each year to the Mayor of London as part of our statutory responsibilities under the London Local Air Quality Management framework.

If you have any comments on this AQAP, please contact us:

Contact: Pollution Control
Department: Public Protection and Enforcement
London Borough of Bromley
Address: Churchill Court
2 Westmoreland Road
Bromley
BR1 1AS
E-mail: ehs.customer@bromley.gov.uk

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Executive summary

Bromley's Air Quality Action Plan 2027-2031 has been produced as part of our statutory duty to the London Local Air Quality Management (LLAQM) legal framework¹.

It has been developed in accordance with the statutory requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995, as amended by the Environment Act 2021.

The Plan outlines the action we will take to improve air quality in Bromley between 2027-2031 and replaces the previous Plan, which ran from 2020-2025, extended to cover 2026.

Air pollution is known to have an impact on public health in the UK. It comprises a complex mixture of gases, liquids, and solid particles, with the primary pollutants of concern being nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}). Exposure to some particulates and gases can be associated with a number of adverse health impacts and are recognised as a contributing factor in the onset of heart disease and cancer, stroke and chronic obstructive pulmonary disease.

In 2021, the Coroner issued a Prevention of Future Deaths report following the inquest into the death of Ella Adoo Kissi Debrah, which concluded that exposure to excessive air pollution was a contributing factor in her death. The report made a number of important recommendations for local government, including recognition that current UK legal air quality objectives and limit values are considerably less stringent than the levels recommended by the World Health Organization (WHO) to protect public health.

Bromley is one of the least polluted London Boroughs and Air Quality is improving further. All of the national Air Quality Objectives are being met in Bromley, nevertheless the Actions outlined in this plan will continue this effort, to further improve air quality, towards the more stringent WHO guidelines.

Following the adoption of our last AQAP in 2020, a range of measures have been successfully delivered in Bromley to improve local air quality. Key achievements include:

- Expansion of our air quality monitoring network, including sites for nitrogen dioxide and PM_{2.5}. These have been used to monitor sources of pollution in the Borough such as traffic and have been used to check compliance against air quality objectives;
- Continued to work with industrial sources in the Borough, through the statutory process of permitting, a process which is completely up to date and has been fully reviewed as part of the previous action plan;
- Continued participation in the pan-London project which requires construction machinery to meet specific emission standards;
- Raised awareness of the health impacts of solid fuel burning, through partnership working with other boroughs via the London Wood Burning Project;
- Planted over 6,000 trees as part of our Treemendous programme, over the last four years;

¹ LLAQM Policy and Technical Guidance. <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs>

- Promoted cycling with over 700 bikes seen in the Council's Dr Bike Sessions in the last five years, which undertake safety checks and simple repairs, delivered by our Road Safety Team;
- Actively participated in the accredited 'Travel for Life programme' for schools, which focuses on reducing car usage and enhancing road safety - Bromley has the highest number of gold accredited schools in London;
- Encouraged schools to undertake anti-idling enforcement across the Borough;
- Purchased an electric waste collection vehicle in 2025 which was added to Bromley's fleet as a pilot project for wider implementation; and
- Delivered Home energy advice in association with the South London Energy Partnership - 235 households assisted in 2024/5.

Levels of NO₂ in Bromley have fallen significantly in the last 10 years, with concentrations reducing by 46.7% since 2016 and this is widely attributed to reductions in emissions from road traffic exhausts, reflecting changes in vehicle technologies, fleet composition and broader transport policy measures.

In contrast, a similar continued downward trend has not been observed for PM₁₀ and PM_{2.5}. PM₁₀ concentrations have reduced by 39% since 2016, but in recent years have plateaued and even increased in the last two years. PM_{2.5} concentrations have plateaued since 2020 and in 2025 returned to levels observed prior to 2020.

The AQAP cuts across a wide range of Council services and has been developed with the support of multiple services within the Council. This collaborative approach helps to ensure the effective delivery of the actions set out in the Plan and supports alignment with other key Council plans and strategies, including the Transport Strategy, the Joint Health and Wellbeing Strategy, Net Zero and our Green Infrastructure Strategy.

The AQAP has also been shaped through engagement with residents, visitors and businesses, whose feedback has informed its development. Bromley Council will continue to work with its communities and stakeholders to deliver improvements to local air quality.

Bromley Council will report annually on progress against this AQAP through the Annual Status Report. We are committed to publishing air quality data and reporting progress openly and transparently.

This AQAP includes general explanations of what air pollution is, the key pollutants of concern and takes a closer look at where pollution comes from. We have then developed actions that can be considered under five broad themes:

- **Air quality monitoring and statutory duties:** maintaining monitoring networks is critical for understanding where pollution is most acute, and what measures are effective to reduce pollution. There are also a number of other core statutory duties undertaken by boroughs, which form the basis of action to improve pollution;
- **Emissions from existing buildings and new developments:** emissions from buildings account for about 15% of the NO_x emissions across London so are important in affecting NO₂ concentrations. They are also an important contributing factor to particulate matter emissions;
- **Cleaner transport:** road transport is the main source of air pollution in London. We can encourage the choice to walk, to cycle and use ultra-low emission vehicles (such as electric). Bromley's vehicle fleet is only small in size, however, tackling our own fleet where practicable means we will be leading by example;
- **Public health and raising awareness:** increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution;
- **Localised solutions:** these seek to improve the environment of neighbourhoods through a combination of measures.

While continuing to address all sources of air pollution across the borough, we have identified ten priority areas where action will deliver the greatest air quality benefits within our control:

Our top ten priorities for this AQAP

- Action point 1 - Maintain the borough's automatic monitoring site at Harwood Avenue and 32 diffusion tubes located throughout the Air Quality Management Area.
- Action point 12 - Ensure emissions from construction are minimised via the requirement of a Construction Environmental Management Plan (CEMP) for all major developments.
- Action point 16 - Ensure Air Quality Neutral guidance is applied to developments.
- Action point 17 - Ensure adequate, appropriate, and well-located green space and infrastructure is included in new developments.
- Action point 22 - Large developments (i.e. those likely to create a significant number of trips) will, where relevant, enter into an agreement to submit and implement acceptable Construction Logistics Plans, and Delivery/ Servicing Plans. Consideration will be given to re-organisation of freight to support consolidation (or micro- consolidation) of deliveries, by setting up or participating in new logistics facilities, and/or requiring that council suppliers participate in these.
- Action point 23 - Discourage unnecessary idling by taxis, coaches and other vehicles (e.g. through anti-idling campaigns or enforcement activity).
- Action point 25 - Installation of residential electric charge points.
- Action point 27 - Sharing of road space; balancing parking at accessible destinations and improving bus journey times, cycling experience, and reduce emissions caused by congested traffic.
- Action point 40 - Encourage schools to join the Travel for Life programme accredited travel planning programme by providing information on the benefits to schools and supporting the implementation of such a programme.
- Action point 44 - Green Infrastructure – tree planting programme subject to available external funding.

It is important to emphasise that Bromley cannot address air quality challenges in isolation. Air pollution does not respect borough, national or even international boundaries, and a significant proportion of the pollution we experience originates from sources outside our direct control, including transboundary pollution.

In addition, many of the major 'A' roads in Bromley fall under the responsibility of Transport for London (TfL). For these reasons, we will continue to engage with, and lobby, both regional and central government on matters that lie beyond the Council's remit, while focusing our own efforts on those areas where we can directly influence change.

Foreword

I am pleased to introduce Bromley's updated Air Quality Action Plan (AQAP), which sets out our continued commitment to safeguarding the health and wellbeing of our residents through cleaner air and a better environment.

Bromley is London's largest borough by area and home to more than 330,000 people. We are fortunate to have extensive green spaces and some of the lowest pollution levels in the capital. Yet we recognise that maintaining and improving air quality requires ongoing effort. As our borough grows and new challenges emerge, we must build on the progress already achieved.

This plan brings together a mixture of established actions and new initiatives that reinforce our ambition for a "clean and safe borough" and support Bromley's broader transformation priorities, including fostering a healthy environment for all. It aligns our local ambitions with the most recent Greater London Authority (GLA) Action Matrix, ensuring that our interventions remain proportionate, evidence-based and tailored to Bromley's unique context.

While the plan provides clear commitments, expected outcomes and a coherent framework for delivery, we also recognise that air quality is a rapidly evolving field. Technological innovation, new research and emerging funding opportunities will all influence how we respond. We will therefore remain open to adopting new approaches where they present clear benefits for residents and businesses.

Crucially, many of the factors contributing to local pollution – particularly those arising from major transport corridors – are outside the Council's direct control. This makes partnership working essential. Through collaboration with regional bodies, neighbouring boroughs, community organisations and other stakeholders, we can make air quality improvements in Bromley.

Together, we remain dedicated to ensuring that Bromley continues to be a place where clean air, health and environmental quality are at the heart of our shared future.

Councillor Coldspring-White

Portfolio Holder for Environment

1. Introduction

This latest update to the Air Quality Action Plan (AQAP) outlines the actions that Bromley Council will deliver between 2027 to 2031 in order to reduce concentrations of pollution, and exposure to pollution; thereby positively impacting on the health and quality of life of residents and visitors to the borough.

It builds on the progress of the previous plan, informed by the latest evidence, and continues to prioritise the reduction of emissions from all sources of air pollution.

Bromley is the greenest and largest London borough by geographic area, reflecting its extensive Green Belt land and predominantly suburban and semi-rural character. Bromley's population is expected to increase modestly by 2031, however, the population is ageing and the proportion of residents aged 65 and over is projected to rise from 17.7% in 2021 to around 20.6% by 2031². This has implications for exposure, health outcomes and service demand relevant to air quality and public health.

This plan has been developed in recognition of the statutory requirement of local authorities to meet the air quality objectives and targets of the Air Quality Strategy under Part IV of the Environment Act 1995, as amended by the Environment Act 2021. It has been prepared in accordance with the requirements of the London Local Air Quality Management (LLAQM) legal framework and the applicable policy guidance, overseen by the Mayor of London.

Local authorities have a duty under Section 83(1) of the 1995 Act to declare an Air Quality Management Area (AQMA) where an air quality objective (AQO) is exceeded or is predicted to exceed. Bromley Council first declared an AQMA in 2007 following evidence of exceedances of the annual mean objective for nitrogen dioxide (NO₂). The original AQMA covered part of the north-west of the borough. In 2020, the AQMA was extended to cover a much wider area of the borough, reflecting updated evidence and LLAQM guidance. The current AQMA covers the whole borough except for Biggin Hill, Darwin and parts of St Mary Cray, St Pauls Cray and Chelsfield.

When an AQMA has been designated, Section 83A(2) of the 1995 Act as amended requires an Action Plan to be prepared, setting out how the borough will exercise its functions to achieve the air quality standards and objectives.

² Office for National Statistics (ONS), *Subnational population projections for England: 2022-based*, published January 2024. Bromley local authority projections to 2031

1.1 What is air pollution?

Air pollution is a combination of solid particles and noxious gases that are emitted into the atmosphere. Some of these emissions occur naturally, and some as a result of human activity, but both can have a negative effect on human health. Human derived pollution is mostly associated with the combustion of fossil fuels such as coal, oil, petrol or diesel. Examples of natural pollution include smoke from forest fires, the production of methane from animals and even sand from the Saharan desert.

1.2 Weather and seasonal impact on pollution levels

When pollution is released into the air, the weather will determine what happens next. For example, when it's windy or wet pollution concentrations remain low, either removed from the air by rain or blown away. When it's hot, dry and still, pollution levels climb, and pollution episodes can occur. Concentration levels are also higher in winter, as more people rely on their heating systems.

1.3 Main pollutants of concern

The main pollutants of concern are nitrogen dioxide and particulate matter. Each has different sources, health effects and chemical behaviours.

1.3.1 Nitrogen dioxide

Nitrogen dioxide (NO₂) is a gas produced as a result of road traffic and other fossil fuel combustion processes. Its presence in air contributes to health effects directly, and also the formation and modification of other air pollutants, such as ozone and particulate matter, both of which are also harmful to health.

1.3.2 Particulate matter

Particulate matter is a mixture of solid particles and liquid droplets suspended in the air, including a variety of chemical compounds and materials, some of which can be toxic. It is the most important air pollutant in terms of health effects and is different from the gaseous pollutants in that it is not a clearly defined chemical compound. It is usually described by its size, with PM₁₀ being particles below 10 micrometres in diameter and PM_{2.5} below 2.5 micrometres (approximately 30 times smaller than the width of a human hair). The larger particles can penetrate into the upper airways, while PM_{2.5} can penetrate deeper into the lungs. Both groups contain much smaller particles which are much more numerous and can penetrate all areas of the lungs and even pass into the bloodstream or brain.

1.4 Impacts of air pollution

In recent years, Bromley has been shown to be amongst the greenest and least polluted of all London Boroughs, however we know that poor air quality is associated with significant adverse health impacts even at low concentrations, including cancer, heart disease, stroke, respiratory diseases, on foetal development, mental health conditions and dementia.

Additionally, air pollution particularly affects the most vulnerable in society: children and older people, those with existing heart and lung conditions, and those living in deprivation. As well as the detrimental impact on health, there is an economic cost to poor air quality. The most recent estimates of costs to local health and care services in Bromley, carried out in 2019, exceeded £50 million³. This includes primary care, secondary care, social care and medications.

In 2021, the Coroner for Inner South London issued a Prevention of Future Deaths (PFD) report following the re-opening of the inquest into the death of Ella Adoo Kissi Debrah. Ella lived close to the South Circular Road and suffered frequent and severe asthma attacks. The Coroner concluded that the medical cause of death was 'asthma, contributed to by exposure to excessive air pollution'⁴. This marked the first time that air pollution had been formally recognised as a contributing cause of death.

The PFD report identified three key issues relevant to air quality management, including specific actions for local government. These can be summarised as follows:

- National limits for particulate matter are set at a level that is far higher than World Health Organization (WHO) guidelines, and that there is no safe level for particulate matter.
- There is low public awareness of the sources of information about national and local pollution levels.
- The adverse effects of air pollution on health are not sufficiently communicated to patients and their carers by medical and nursing professionals, and this needs to be addressed at all levels.

This AQAP acknowledges the role of councils in improving local environmental conditions and responds to the issues highlighted in the PFD report, supported by increasing evidence of the public health impacts of air pollution.

³ London Borough of Bromley (2019). *Joint Strategic Needs Assessment: Quality of the Environment*

⁴ <https://www.judiciary.uk/wp-content/uploads/2021/04/Ella-Kissi-Debrah-2021-0113-1.pdf>

1.5 Themes for this AQAP

In order to deliver continued improvements in air quality in Bromley, for this AQAP update, we have developed actions that can be considered under five broad themes:

- Air quality monitoring and statutory duties
- Emissions from existing buildings and new developments
- Cleaner transport
- Public health and awareness raising
- Localised solutions

1.6 Reporting progress

Under the London Local Air Quality Management (LLAQM) framework, the Council is required to submit an Annual Status Report (ASR) to the Mayor of London each calendar year. The Council will continue to publish the ASR in full following approval each year.

The ASR presents detailed air quality monitoring data from the borough's automatic monitoring site at Harwood Avenue and from the diffusion tube network. This information is used to assess progress against the national Air Quality Objectives (AQOs) on an annual basis.

The ASR also provides a comprehensive update on progress in delivering the Air Quality Action Plan (AQAP). Progress against the actions, measures and targets set out in this AQAP will be reported annually through the ASR.

2. Air Quality in Bromley

2.1 Limits and targets

A range of terms are used within policy and legislation to describe acceptable concentrations of air pollutants. In UK law and regulations, these are described as air quality standards, objectives, targets and limits. They are typically provided in terms of a concentration (amount of the pollutant in air, in micrograms per cubic metre, $\mu\text{g m}^{-3}$) over a certain period. As such, they can be set over the long term (e.g. a year) or the short term (e.g. one hour). There are also exposure reduction targets, which are set to reduce long-term exposure of the population to air pollution compared to a baseline level.

In England, the most recent limits and targets are derived from the [Air Quality Standards Regulations 2010](#) and the [Environmental Targets \(Fine Particulate Matter\) \(England\) Regulations 2023](#). These are detailed in the [Air Quality Strategy](#). They are known as the national Air Quality Objectives (AQOs) and are the legal basis for local authorities in England and under the LLAQM framework. AQOs are set considering both the available evidence for health impacts and the feasibility of achieving the level within a timeframe. Those for the most relevant pollutants are shown in Table 1.

The WHO also publish global **air quality guidelines**. In late 2021 they published revised guidelines⁵, this represents a significant update since the last Air Quality Action Plan with guidelines being reduced to reflect evidence of the health effects of air pollution at lower levels. These guidelines are stricter than limits and targets set in UK law. The National Air Quality Objectives and corresponding WHO guidelines, for NO₂ and PM_{2.5} are presented in Table 2.

Table 1 - UK Air Quality Objectives, Targets and Limits

Pollutant	Objective/Target/Limit	Type/Averaging Period
NO ₂	40 $\mu\text{g m}^{-3}$	Annual mean (calendar year)
	200 $\mu\text{g m}^{-3}$ (not to be exceeded more than 18 times per year)	1-hour mean
PM ₁₀	40 $\mu\text{g m}^{-3}$	Annual mean (calendar year)
	50 $\mu\text{g m}^{-3}$ (not to be exceeded more than 35 times per year)	24-hour mean
PM _{2.5}	20 $\mu\text{g m}^{-3}$ (current legal limit)	Annual mean (calendar year)
	10 $\mu\text{g m}^{-3}$ (by 2040)	
	12 $\mu\text{g m}^{-3}$ (interim target by 2028)	
	35% reduction in population exposure (by 2040)	Exposure reduction target (compared to 2018 baseline)
	22% reduction in population exposure (interim target by 2028)	

⁵ 2021 WHO Guidelines [WHO global air quality guidelines: particulate matter \(PM_{2.5} and PM₁₀\), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide](#)

Table 2 - National Air Quality Objectives and WHO recommended guideline levels for NO₂ and PM_{2.5}

Pollutant	Averaging Time	National Air Quality Objective (µg m ⁻³)	WHO guideline level (µg m ⁻³)				
			Interim				Guideline
NO ₂	Annual	40	40	30	20	-	10
PM _{2.5}	Annual	20	35	25	15	10	5

Bromley is meeting all of the national objectives for Nitrogen Dioxide (NO₂) and the current objectives for Particulate Matter (PM₁₀ and PM_{2.5}). However, for PM_{2.5} the legal objective is far higher than the World Health Organisation (WHO) recommended guideline limit. For this reason, in the London Environment Strategy the Mayor has committed to meeting the WHO health-based guideline limits across London by 2030. Bromley, along with all other London Boroughs, exceeds the World Health Organisation guideline PM_{2.5} limits, so a key area of focus will be to reduce this pollutant as far as reasonably practicable.

2.2 Sources of air pollution in Bromley

Air pollution in Bromley arises from a wide range of sources, including emissions generated within the borough and transboundary pollution originating from outside its boundaries. In some instances, pollution affecting Bromley can come from well beyond London and the UK, for example during certain weather conditions that transport more polluted air from continental Europe.

Identifying the main sources of air pollution in Bromley allows targeted actions to be developed to reduce emissions. The London Atmospheric Emissions Inventory (LAEI), produced by the Greater London Authority (GLA), provides a detailed breakdown of the sources of nitrogen oxides (NO_x), particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}) within the borough.

NO_x

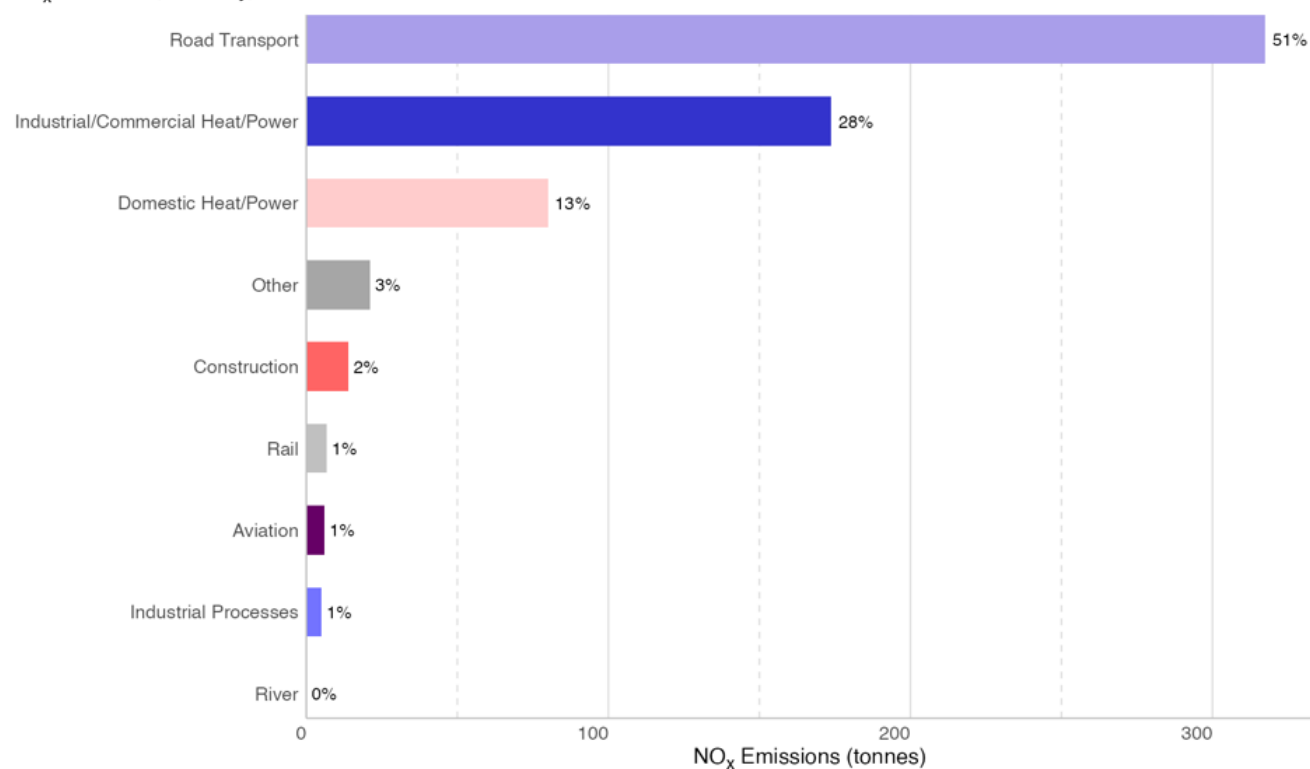
In Bromley, emissions of nitrogen oxides (NO_x) have declined significantly over the past decade. Historically, road transport – including cars, buses and heavy goods vehicles – was the dominant source of NO_x emissions within the borough. However, the contribution from road transport has reduced substantially over time, largely due to lower exhaust emissions. This reflects a range of factors, including improvements in vehicle technology, changes in fleet composition as newer vehicles meeting more stringent Euro emission standards have been introduced and the upgrading of the Transport for London bus fleet to at least Euro VI standards. Transport for London has also set a target for all buses to be electric by 2034. According to the latest London Atmospheric Emissions Inventory (LAEI), road transport now accounts for approximately 51% of NO_x emissions in Bromley.

As emissions from road transport have declined, emissions from heat and power generation have become a more prominent source of NO_x in Bromley. These emissions arise from both industrial and commercial activities, as well as domestic sources. The LAEI data suggests that these now total 41% of NO_x emissions in Bromley. Typical contributors include gas fired boilers for space and water heating in homes and businesses, along with diesel generators used for standby or supplementary power supply. This data is represented in Figure 1.

Figure 1 - LAEI 2025 Sources of NO_x emissions by source in Bromley

LAEI - Emissions by Source

NO_x Emissions, Bromley, 2025



TfL Strategic Analysis

PM₁₀

According to the latest London Atmospheric Emissions Inventory (LAEI), road transport is the largest source of particulate matter (PM₁₀) emissions in Bromley, accounting for approximately 35% of total emissions. This includes emissions from vehicle exhausts as well as non-exhaust sources such as brake and tyre wear.

Construction activity is the second largest contributor, responsible for around 20% of PM₁₀ emissions. This includes dust generated during construction and demolition works and emissions from non-road mobile machinery (NRMM), such as excavators and other plant.

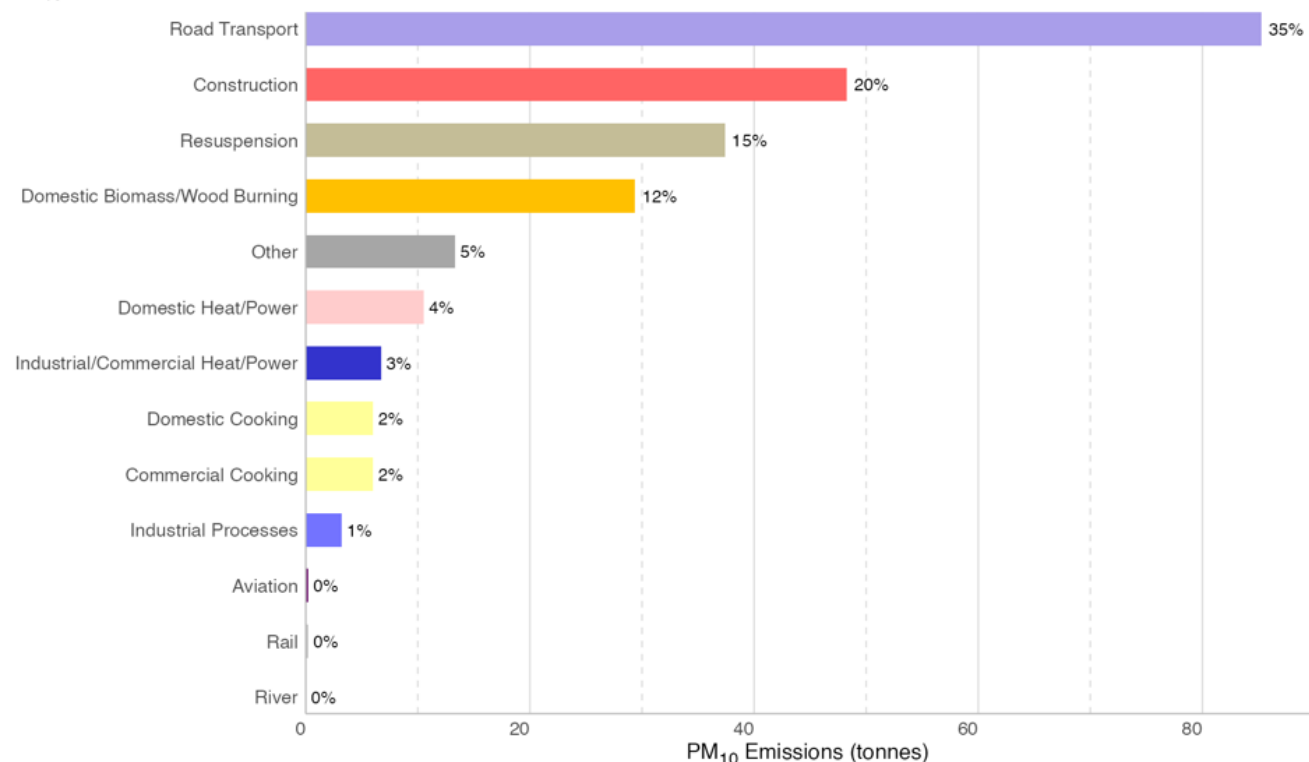
Resuspension accounts for approximately 15% of PM₁₀ emissions in Bromley. This occurs when particles that have previously settled on road surfaces or the ground are disturbed and re-enter the air, for example through the movement of fast moving or heavy vehicles.

Domestic wood burning is also a notable source, contributing around 12% of PM₁₀ emissions. This reflects emissions from the combustion of solid fuels for heating within homes. This data is represented in Figure 2.

Figure 2 - LAEI 2025 Sources of PM₁₀ emissions by source in Bromley

LAEI - Emissions by Source

PM₁₀ Emissions, Bromley, 2025



TfL Strategic Analysis

PM_{2.5}

Data from the 2025 London Atmospheric Emissions Inventory (LAEI) indicate that road transport is the largest source of fine particulate matter (PM_{2.5}) emissions in Bromley, accounting for approximately 34% of total emissions.

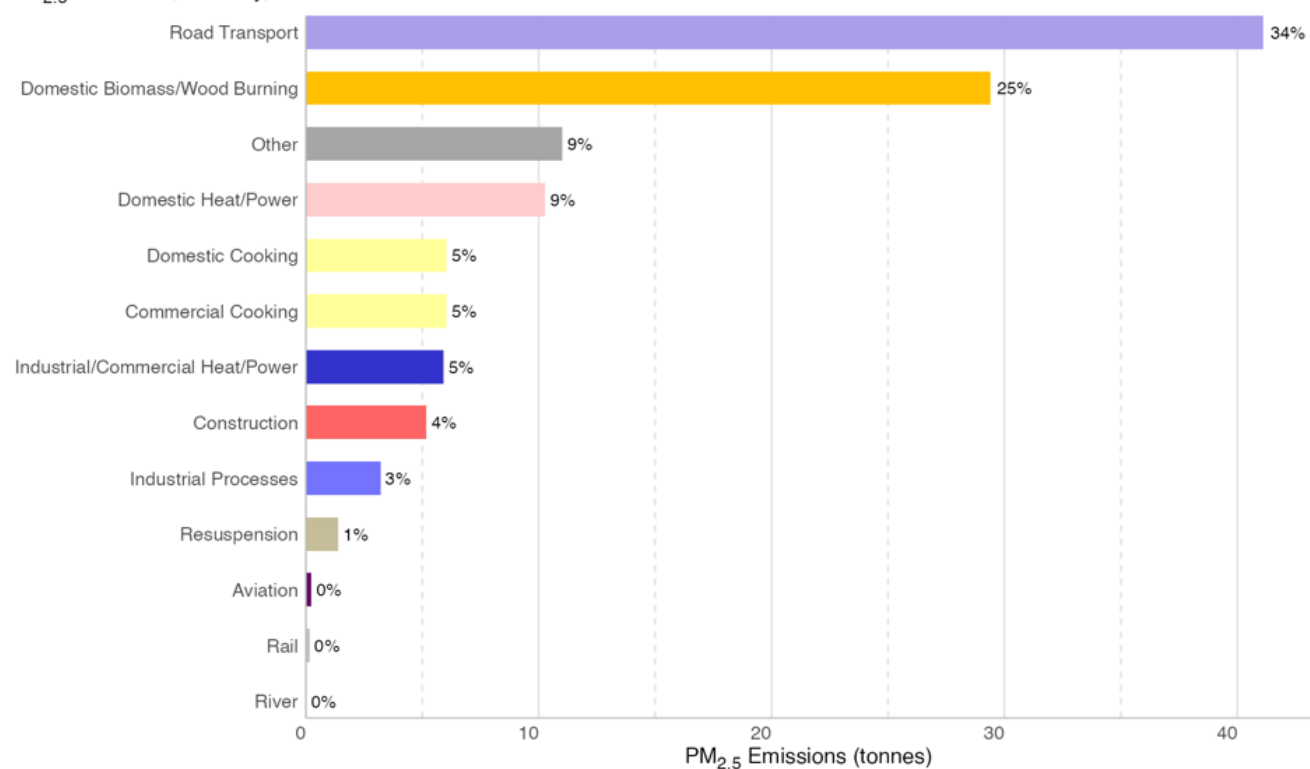
Domestic wood burning is a significant contributor to PM_{2.5} emissions in Bromley, responsible for around 25% of emissions. This reflects emissions from the combustion of solid fuels within homes, including wood burning stoves, open fireplaces and other solid fuel heating appliances.

Emissions from domestic heat and power account for approximately 9% of PM_{2.5} emissions in the borough. These primarily arise from fuel combustion for space and water heating in residential properties, such as gas fired boilers and other household heating systems. This data is represented in Figure 3.

Figure 3 - LAEI 2025 Sources of PM_{2.5} emissions by source in Bromley

LAEI - Emissions by Source

PM_{2.5} Emissions, Bromley, 2025



TfL Strategic Analysis

2.3 Air Quality Management Area and Focus Areas

AQMA

An Air Quality Management Area (AQMA) is declared under the LAQM regime to identify areas where air quality objectives are not met, with a statutory requirement to produce an Air Quality Action Plan to implement measures which will improve air quality within that area.

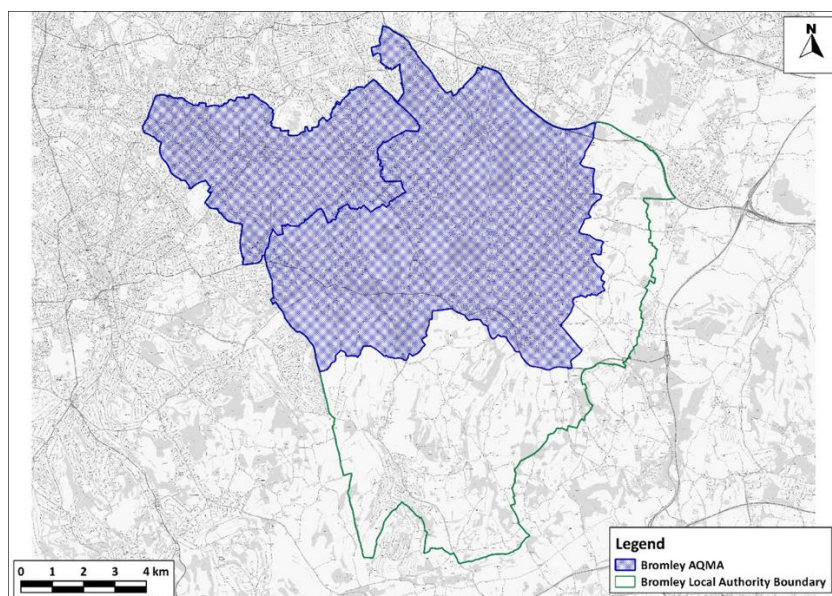
In Bromley an AQMA has been declared which is an area encompassing the northern part of the borough excluding Biggin Hill, Darwin and parts of St Mary Cray, St Pauls Cray and Chelsfield. A map of the AQMA is provided in Figure 4.

The AQMA has been declared for nitrogen dioxide and was increased in size in 2020. Bromley is currently meeting all of the UK Air Quality Objectives, however in line with guidance from the GLA, the Council will continue to work towards improving air quality across the Borough, targeting the WHO 2021 guidelines, which are much more challenging.

Air Quality Focus Areas

Air Quality Focus Areas (AQFAs) are locations designated by the GLA where the annual mean objective/limit value for NO₂ (40 µg m⁻³) is at risk of being exceeded and also have high levels of population exposure⁶. They are derived from the LAEI and other data indicating limit value exceedances. These areas are commonly identified as air quality hotspots where pollution levels and associated impacts are most acute.

Figure 4 - Declared AQMA



⁶ Limit value exceedances under the Air Quality Standards Regulations 2010 are determined using defined monitoring and modelling techniques: monitoring from the Automatic Urban and Rural Network (AURN) and PCM (Pollution Climate Mapping) modelling

Bromley has two AQFA's within the Borough; one incorporating Tweedy Road (A21), High Street Bromley and Widmore Road (A222) and the other at Croydon Road between Elmers End Green and Croydon Road. A map demonstrating the AQFA's is provided in Figure 5.

Given the improvements in air quality across the Borough, the Council will be working with the GLA to remove these.

Figure 5 - Air Quality Focus Areas in Bromley



2.4 LAEI and air quality monitoring

The LAEI provides modelled maps showing ground level concentrations of nitrogen dioxide (NO₂), particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}) across London boroughs. These maps are derived from air quality modelling, which draws on a range of local emissions data – including traffic volumes and vehicle speeds – to estimate average concentrations of each pollutant.

The modelled maps are another tool to identify locations of poor air quality. The latest LAEI maps for NO₂, PM₁₀ and PM_{2.5} are shown in Figure 6, Figure 7 and Figure 8 respectively.

Figure 6 - Modelled map of 2022 annual mean NO₂ concentrations (from the LAEI - published 2025)

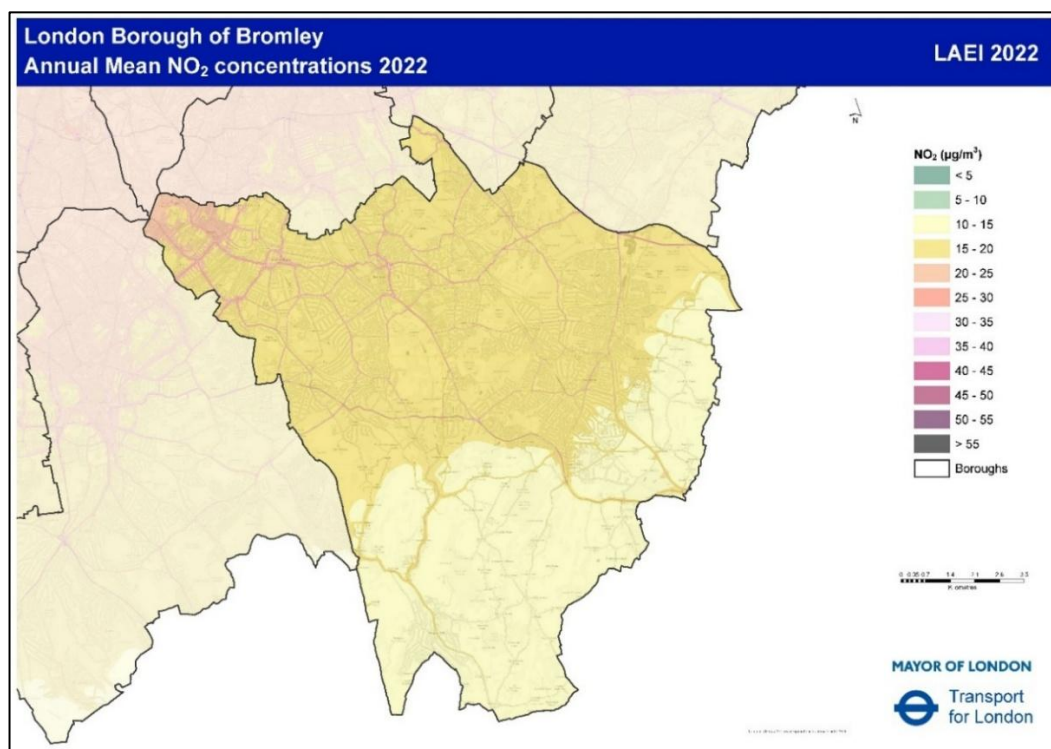
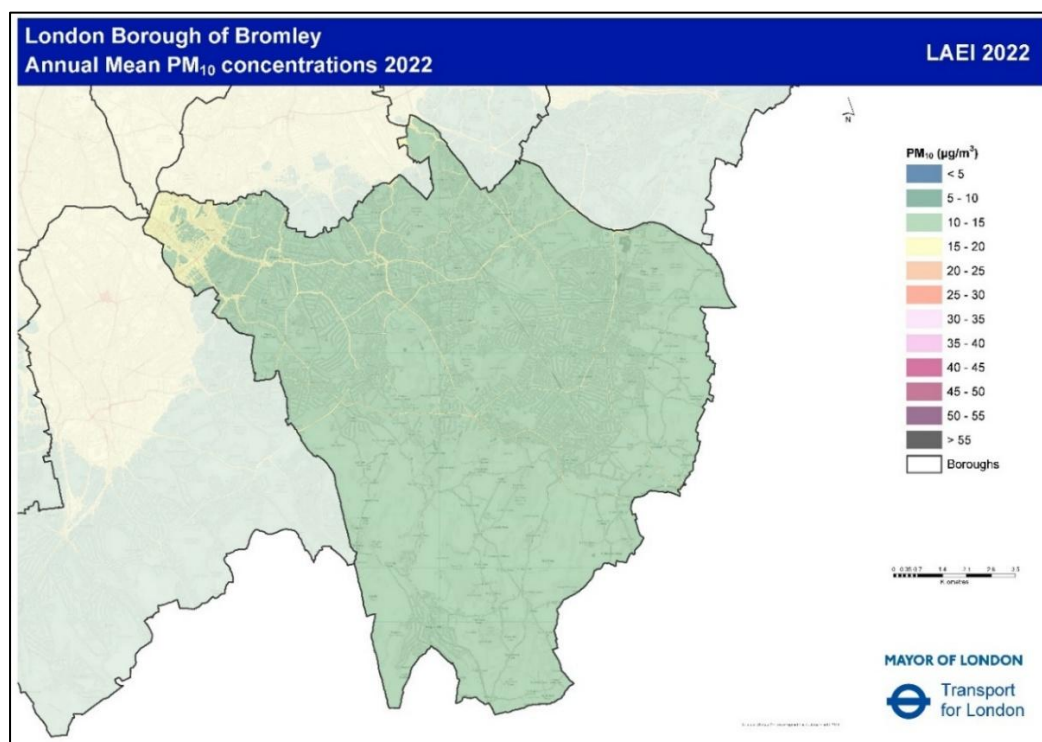
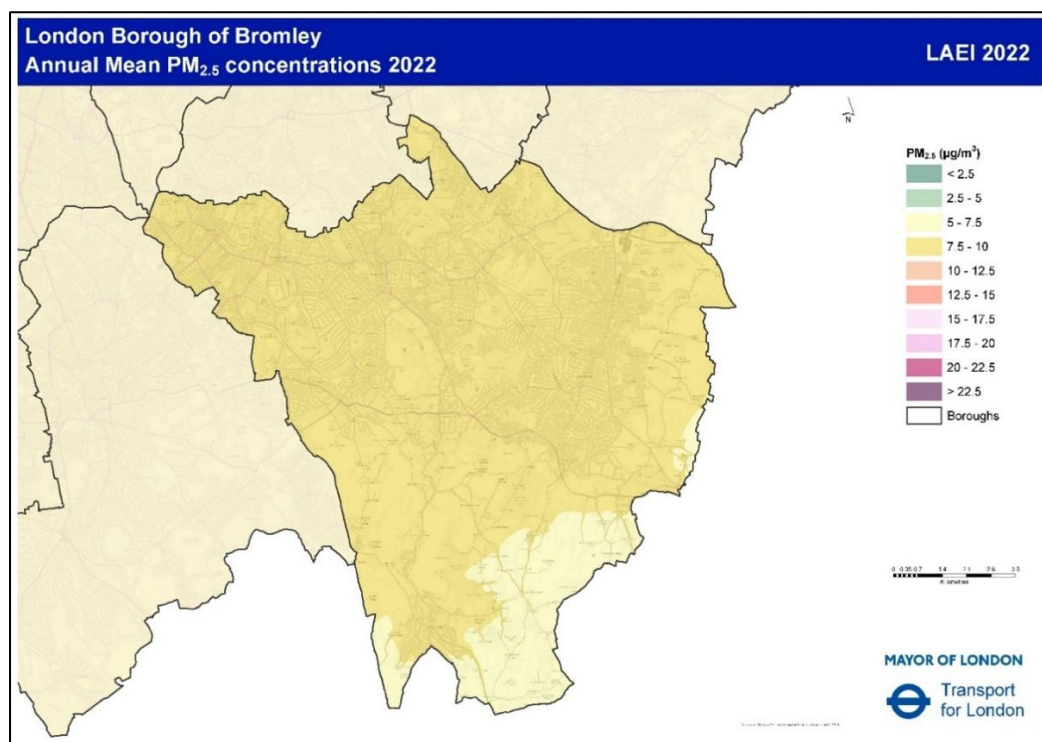


Figure 7 - Modelled map of 2022 annual mean PM₁₀ (from the LAEI - published 2025)Figure 8 - Modelled map of 2022 annual mean PM_{2.5} (from the LAEI - published 2025)

These maps show that TfL red routes (including the A21 and the A232) and other through roads remain pollution hotspots.

2.5 Air quality monitoring in Bromley

Bromley operates a comprehensive air quality monitoring network to measure levels of air pollution across the borough. Air quality monitoring is essential for understanding how air quality is changing over time, evaluating the effectiveness of measures taken to improve air quality, and providing timely and transparent information to residents and other stakeholders. Monitoring across the borough is undertaken using the following established methods:

Automatic air quality monitors provide real time air quality data from a fixed location and are capable of measuring a range of pollutants. They provide detailed information on how pollutant concentrations vary hour by hour and on different days of the week. In Bromley, our automatic monitoring station is located in Harwood Avenue (Figure 9) and is used to measure nitrogen dioxide (NO₂), particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}).

Automatic monitors are large, fixed items of equipment that provide high quality data to the most rigorous data standards, known as 'reference methods'⁷. However, they are more expensive to operate than other monitoring methods and require ongoing calibration and maintenance.

Diffusion tubes (Figure 10) are passive monitors that measure monthly average levels of NO₂. These are small, affordable, and easy to deploy. They are left open to the air for 4-5 weeks, before being sent off to a laboratory for analysis. They are useful in measuring long-term levels of air pollution across many different areas of the borough. In Bromley, they are typically attached to lampposts and street furniture.

Figure 9 - Harwood Avenue automatic monitoring station



Figure 10 - NO₂ diffusion tube attached to a telegraph post in Bromley

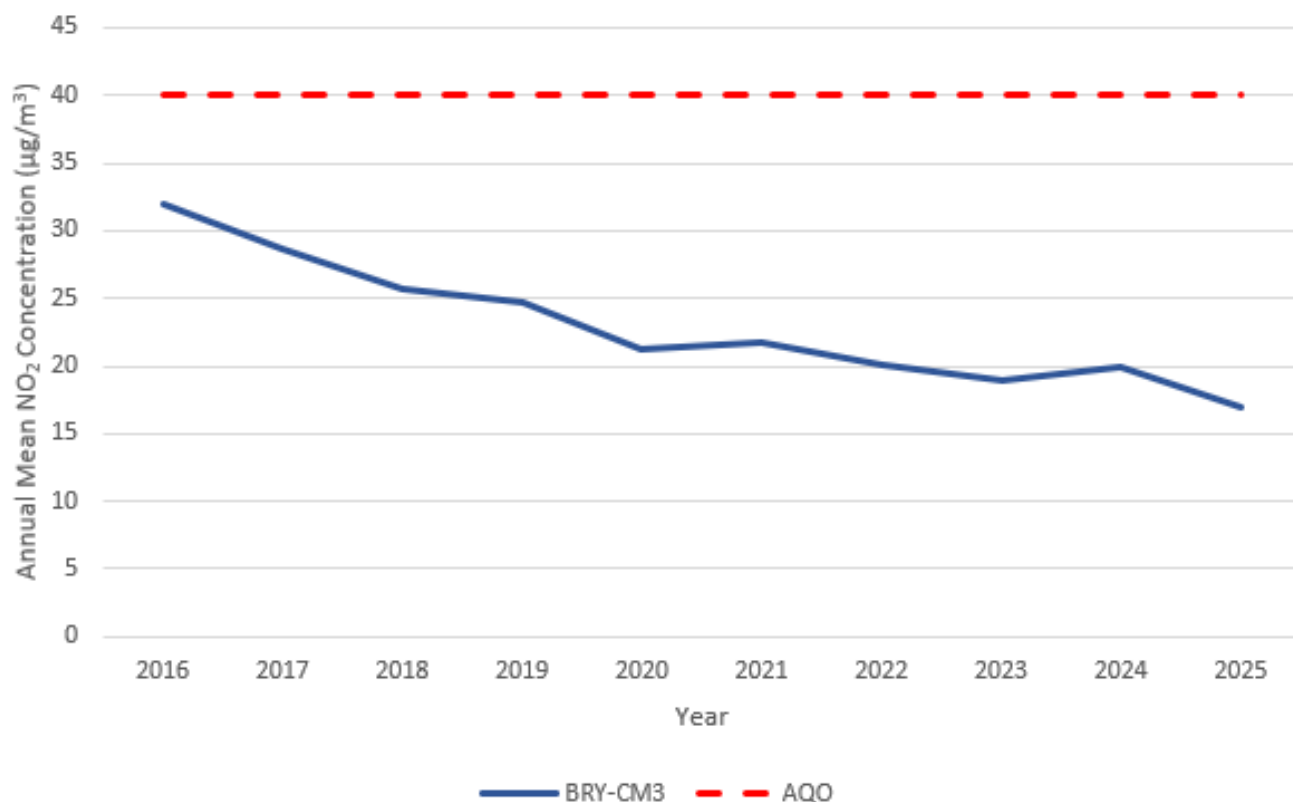


⁷ More information on reference methods is available on the [UK Air Information Resource website](#)

NO₂

Levels of NO₂ in Bromley have fallen significantly in the last 10 years, with concentrations reducing by 46.7% since 2016 and this is widely attributed to reductions in emissions from road traffic exhausts, reflecting changes in vehicle technologies, fleet composition and broader transport policy measures. Figure 11 shows the measured annual mean concentrations of NO₂ over the last ten years at the Harwood Avenue automatic monitoring site.

Figure 11 - Annual Mean NO₂ concentrations at the Harwood Avenue Automatic Monitoring Site between 2016-2025



During the Covid 19 pandemic, lockdown restrictions in the UK resulted in a substantial reduction in road traffic, which in turn led to a marked decrease in annual mean pollutant concentrations. In Bromley, annual mean NO₂ levels have not returned to pre pandemic levels. While an increase was observed in 2024, this was followed by a reduction in 2025, with average concentrations remaining lower than those recorded in 2019.

PM₁₀ and PM_{2.5}

In contrast, a similar continued downward trend has not been observed for PM₁₀ and PM_{2.5}. PM₁₀ concentrations have reduced by 39% since 2016, but in recent years have plateaued and even increased in the last two years. PM_{2.5} concentrations have plateaued since 2020 and in 2025 returned to levels observed prior to 2020. This may be due to increasing contributions from sources such as construction activity, non exhaust traffic emissions (including brake and tyre wear), domestic wood burning and commercial cooking.

Figure 12 shows the measured annual mean concentrations of PM₁₀ over the last ten years at the

Harwood Avenue automatic monitoring site. Figure 13 shows the measured annual mean concentrations of PM_{2.5} over the last six years, since the beta attenuation monitor (BAM) was installed at the Harwood Avenue automatic monitoring site.

Figure 12 - - Annual Mean PM₁₀ concentrations at the Harwood Avenue Automatic Monitoring Site between 2016-2025

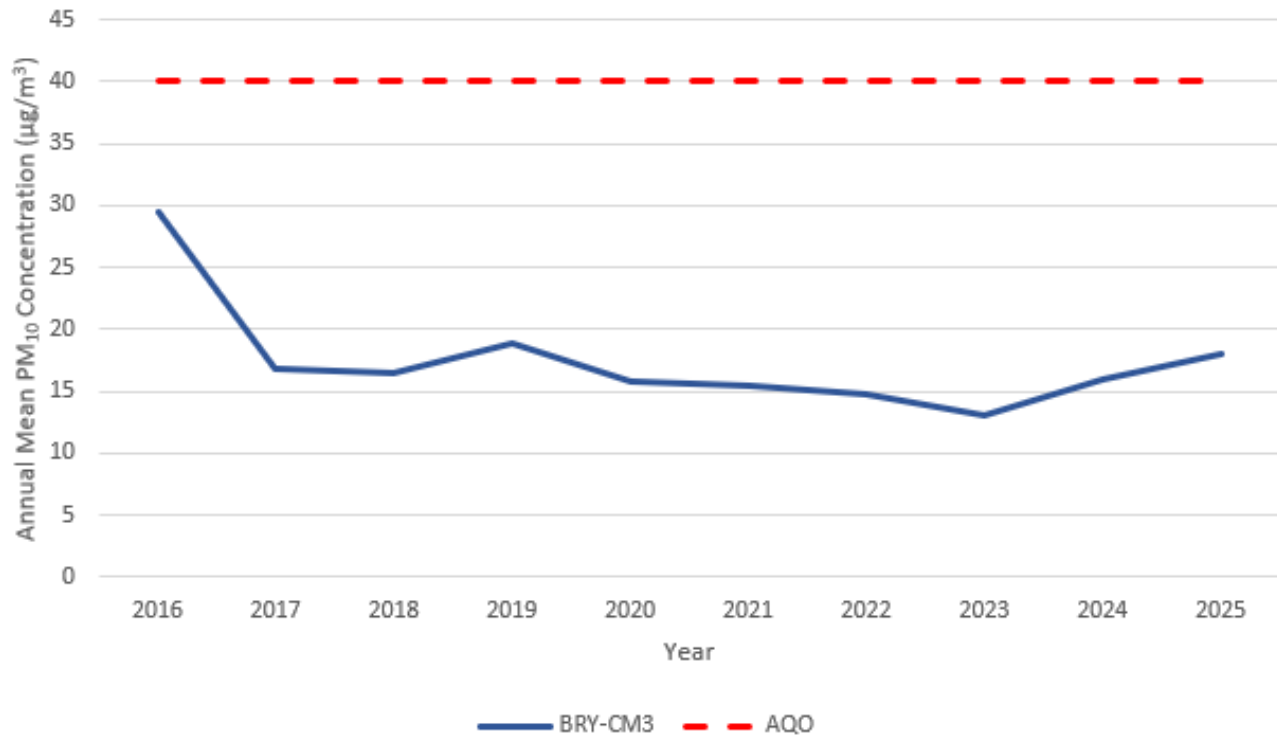
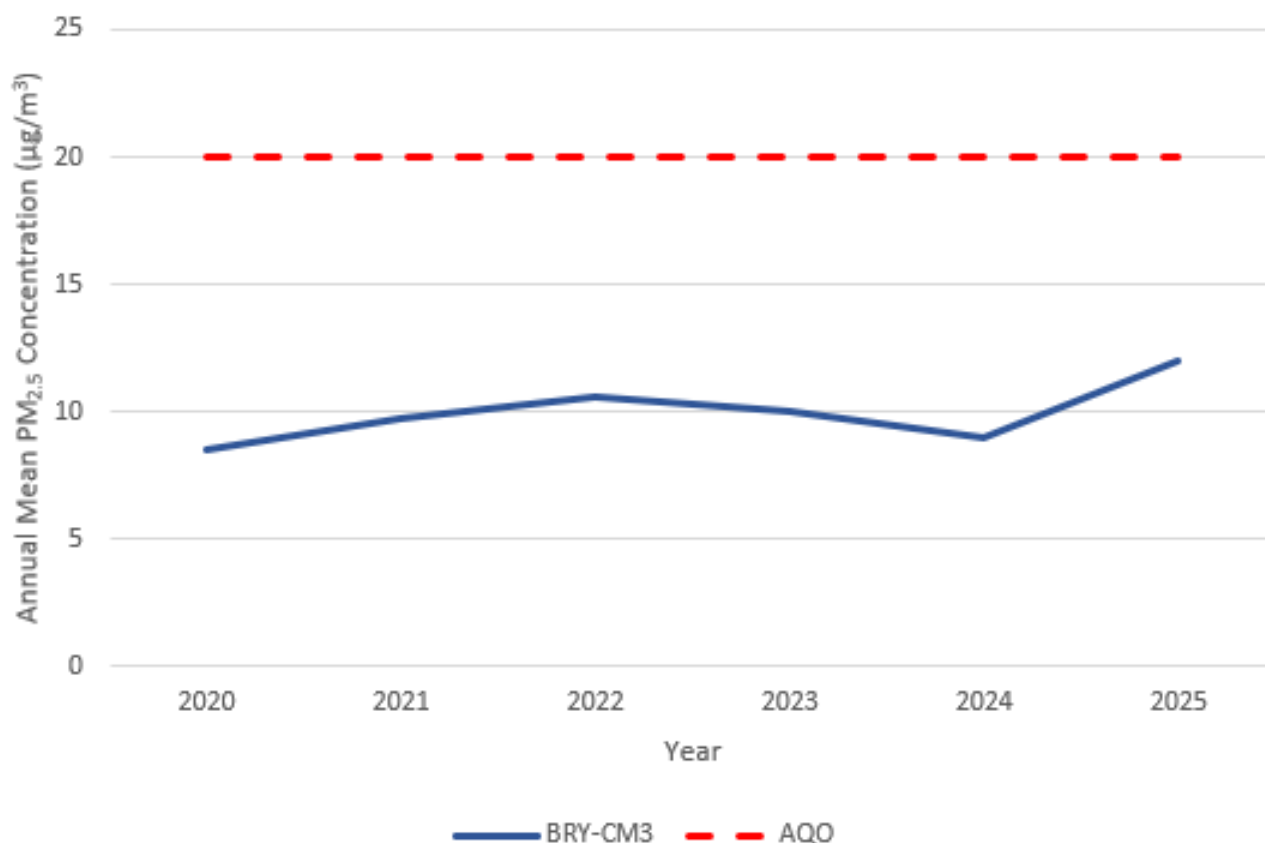


Figure 13 - Annual Mean PM_{2.5} concentrations at the Harwood Avenue Automatic Monitoring Site between 2020-2025



2.6 Future air quality in Bromley

As well as providing information on historic emissions, the LAEI includes predictions of emissions in Bromley in the future, up to 2030.

The LAEI projections indicate that air quality in Bromley is expected to continue improving towards 2030, particularly for nitrogen dioxide (NO₂). However, the scale of improvement varies by pollutant, and particulate matter (PM₁₀ and PM_{2.5}) is projected to remain the main long-term challenge.

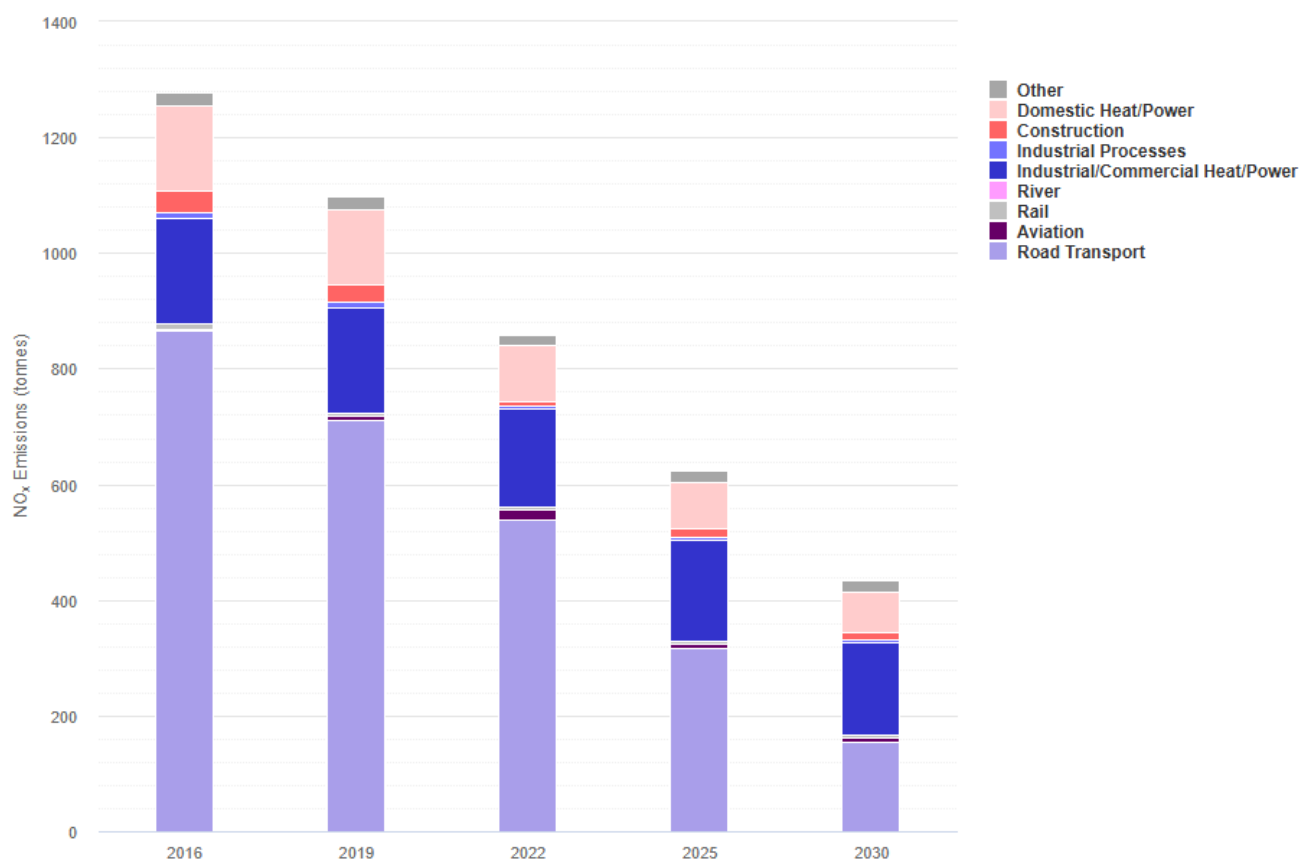
The LAEI model indicates that highest future concentrations in 2030 remain associated with major transport corridors, particularly TfL-managed A-roads.

NO₂

Modelled NO₂ concentrations are projected to reduce substantially by 2030 across Bromley compared with 2022 levels. This improvement is primarily driven by continued reductions in emissions from road transport and technological change. These include the turnover of the vehicle fleet to newer, cleaner cars and vans, the introduction of ultra-low-emission vehicles, and the upgrading of the TfL bus fleet.

Road transport NO_x emissions across Bromley are forecast to fall significantly by 2030 relative to 2022, with corresponding reductions in roadside NO₂ concentrations. As a result, the majority of locations in Bromley are projected to be well below the national annual mean NO₂ objective of 40 µg m⁻³ by 2030, supporting our longer-term ambition to work towards more stringent, health-based targets.

Figure 14 - LAEI Emissions trend by source to 2030 – NO_x emissions in Bromley

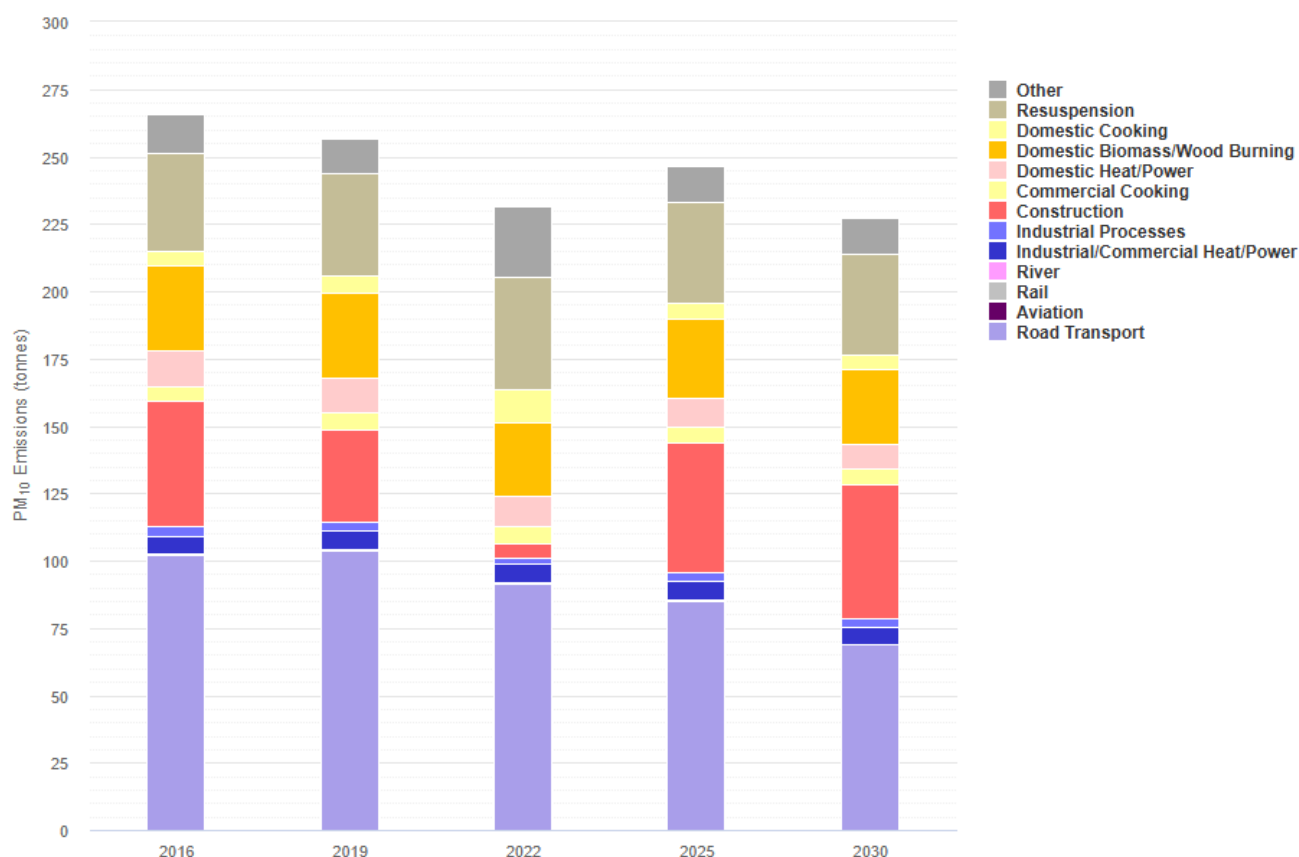


PM₁₀

In contrast to NO₂, reductions in PM₁₀ concentrations by 2030 are projected to be more modest. While exhaust emissions from vehicles are expected to continue to decline, these benefits are partially offset by other sources of particulate matter. These include non-exhaust traffic emissions such as brake and tyre wear, construction and demolition activity, and the resuspension of road dust.

The LAEI projections therefore suggest that PM₁₀ concentrations in Bromley are likely to decline slowly or plateau, particularly in areas close to busy roads and construction activity. This reinforces the importance of AQAP measures that focus on controlling emissions from construction sites, including Non-Road Mobile Machinery (NRMM) controls, Construction Environmental Management Plans and dust management and enforcement.

Figure 15 - LAEI emissions by source to 2030 - PM₁₀ emissions in Bromley

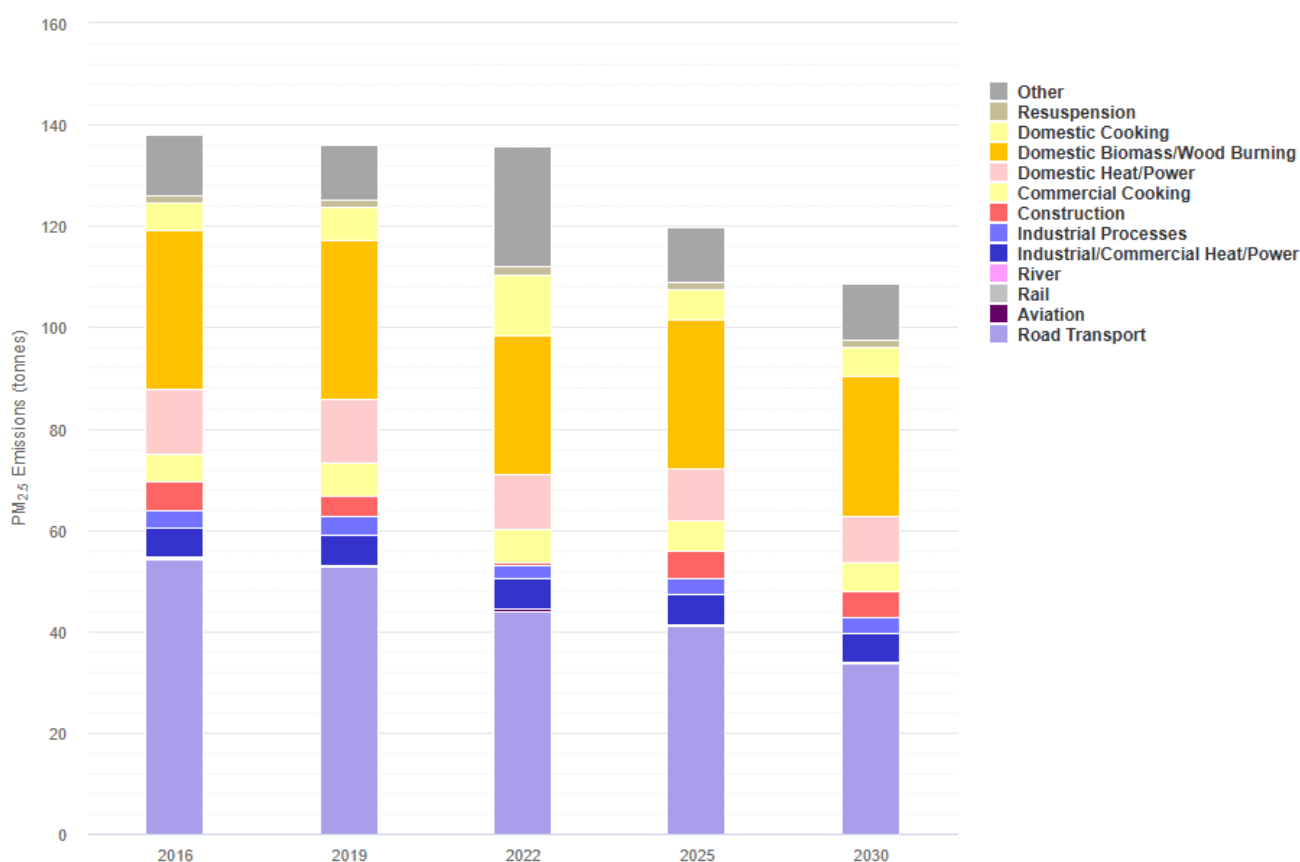


PM_{2.5}

Reductions in fine particulate matter are projected to be smaller and slower than those for NO₂. By 2030, emissions and concentrations of PM_{2.5} are forecast to be lower than in 2022; however, PM_{2.5} remains influenced by a wide range of sources, many of which are difficult to address through local action alone. These include domestic wood burning, non-exhaust traffic emissions, emissions from heating, and regional and transboundary pollution.

As a result, although PM_{2.5} concentrations are expected to improve, Bromley is still likely to exceed the World Health Organization (WHO) guideline value for PM_{2.5} in 2030, consistent with projections for most London boroughs. PM_{2.5} therefore remains the pollutant most strongly associated with long-term public health risk, and a key focus of this AQAP.

Figure 16 - LAEI emissions trend by source to 2030 – PM_{2.5} emissions in Bromley



2.7 Bromley's commitments

We recognise that air pollution can have adverse health effects even at concentrations below the UK's Air Quality Objectives (AQOs). In adopting this AQAP, Bromley Council therefore commits to a pathway towards achieving more stringent air quality targets, informed by the World Health Organization (WHO) guideline values and associated interim targets.

Our commitment is to work towards achieving the following annual mean targets across Bromley by the end of this AQAP period in 2031:

Pollutant	Target	Equivalent 2021 WHO interim target
NO ₂	30 µg m ⁻³	2 nd interim target
PM _{2.5}	10 µg m ⁻³	4 th interim target

These targets have been selected to be stretching yet achievable, taking into account the sources and characteristics of each pollutant, as well as current air quality levels in Bromley.

We will assess relevant plans, proposals and policies against these targets and will continue to work towards reducing pollutant concentrations to the lowest levels reasonably possible.

3. Achievements of the AQAP 2020-2025 (extended to cover 2026)

Delivery of the AQAP is monitored through the Annual Status Report (ASR), which is produced and published each year. The ASR enables the Council to track progress against agreed commitments and assess performance in delivering the actions set out in the Plan. Annual progress can be viewed via the [ASRs available on the Council's website](#).

The AQAP 2021–2025 (extended to cover 2026) was organised around five key thematic areas. Key achievements under each theme from the previous AQAP period are outlined below:

3.1 Monitoring air quality

- Expansion of our air quality monitoring network, including sites for nitrogen dioxide and PM_{2.5}. The diffusion tube network was reviewed and the total number of tubes was increased to 32. A PM_{2.5} beta attenuation monitor (BAM) was installed at Harwood Avenue automatic monitoring site in 2020. These have been used to monitor sources of pollution in the Borough such as traffic and have been used to check compliance against air quality objectives.

3.2 Reducing emissions from building and new development

- Continued to work with industrial sources in the Borough, through the statutory process of permitting, a process which is completely up to date and has been fully reviewed as part of the previous action plan.
- Continued participation in the [pan-London project](#) which requires construction machinery to meet specific emission standards.
- Delivered [Home energy advice](#) in association with the South London Energy Partnership - 235 households assisted in 2024/5.

3.3 Public health and awareness raising

- Raised awareness of the health impacts of solid fuel burning, through partnership working with other boroughs via the [London Wood Burning Project](#).

3.4 Reducing emissions from transport

- Promoted cycling with over 700 bikes seen in the Council's Dr Bike Sessions in the last five years, which undertake safety checks and simple repairs, delivered by our Road Safety Team.
- Actively participated in TfL accredited '[Travel for Life programme](#)' for schools, which focuses on reducing car usage and enhancing road safety - Bromley has the highest number of gold accredited schools in London.
- Encouraged schools to undertake anti-idling enforcement across the Borough.
- Purchased an electric waste collection vehicle in 2025 which was added to Bromley's fleet as a

pilot project for wider implementation.

3.5 Local solutions

- Planted over 6,000 trees as part of our [Treemendous programme](#), over the last four years -
 - During the 2021/22 planting season, Bromley Council, with our contractors planted 1,462 trees in the borough. Of these, 1,250 were brand new trees, with an additional 212 routine replacement trees.
 - During the 2022/23 planting season, Bromley Council, with our contractors planted 1,590 trees in the borough. Of these, 1,250 were brand new trees, with an additional 340 routine replacement trees.
 - During the 2023/24 planting season, Bromley Council, with our contractors planted 1,531 trees in the borough. Of these, 1,250 were brand new trees, with an additional 281 routine replacement trees.
 - During the 2024/25 planting season, Bromley Council, with our contractors planted 1,585 trees in the borough. Of these, 1,250 were brand new trees, with an additional 335 routine replacement trees.

4. Development and Implementation of the AQAP 2027-2031

4.1 Consultation and Stakeholder Engagement

In developing/updating the action plan we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 3. In addition, we have undertaken the following stakeholder engagement:

- Bromley's website
- Bromley's social media platforms

The response to our consultation stakeholder engagement is given in Appendix A.

Table 3 - Consultation undertaken

Yes/No	Consultee
	The Environment Agency
	Transport for London and the Mayor of London (who will provide a joint response)
	Defra
	All neighbouring local authorities
	Other public authorities as appropriate
	Bodies representing local business interests and other organisations as appropriate

5. Action Plan

Bromley's Air Quality Action Plan (AQAP) 2027–2031 is structured around the following five thematic areas:

1. **Air quality monitoring and statutory duties** - monitoring air quality, assessing compliance with our adopted targets and carrying out core statutory functions related to air pollution.
2. **Reducing emissions from existing buildings and new developments** - reducing emissions from buildings in operation, in particular those from heating, power and industrial processes and minimising emissions associated with development through the planning system and regulating construction activity.
3. **Cleaner transport** - reducing emissions from transport, including the Council's own fleet.
4. **Public health and awareness raising** - improving awareness of the health impacts of air pollution and encouraging behaviour change to reduce exposure to poor air quality.
5. **Localised solutions** - improving the environment of neighbourhoods through a combination of measures including, green infrastructure and maximizing benefits from energy efficiency measures.

The Air Quality Action Plan matrix is detailed in Section 6, which contains information about each action we set out in this Section. Within the matrix, we outline measures, which are the steps we will take or work we will do to progress our action.

The matrix also includes the following additional information relating to each action:

- Responsibility - the departments and service areas in the Council that are responsible for delivering this action.
- Cost - an estimated cost of delivering this action.
- Benefit - the anticipated improvement to air quality or reduction to exposure.
- Outputs – how we will measure action point progress.
- Where further information can be found.
- Action points indicated with an asterisk are in addition to those listed in the GLA LLAQM Borough Air Quality Action Matrix.

5.1 Air quality monitoring and statutory duties

We will utilise our air quality monitoring to not only assess compliance with Government objectives, but importantly to support and evaluate our policies and projects. We will share our data via annual status reporting, the [Air Quality England](#) platform and utilise the Breathe London network, which is using sensor technology to provide publicly accessible data across London. Monitoring air quality is crucial to our statutory duties within the Local Air Quality Management regime, and for tracking trends in air quality across the borough.

All local authorities have statutory responsibilities under Part IV of the Environment Act 1995, which requires councils to review and assess air quality within their area and to work towards meeting prescribed air quality objectives, limits and targets. In Bromley, we are also committed to working towards the World Health Organization (WHO) guideline interim targets, which are more stringent

than current UK air quality objectives.

Air quality monitoring plays a critical role in understanding whether these standards are being met and in identifying locations and pollutants where action should be prioritised.

Our actions

Priority action:

- **Action point 1 - Maintain the borough's automatic monitoring site at Harwood Avenue and 32 diffusion tubes located throughout the Air Quality Management Area.**
- **Action point 2** - Review the monitoring network to ensure that it is still fit for purpose and add additional monitoring if required.
- **Action point 3** - Compile an Annual Status Report (ASR) on air quality in Bromley and publish on our website.
- **Action point 4** - Where appropriate, use planning obligations to secure funding from developers for monitoring compliance checks on major and/or sensitive sites.
- **Action point 5** - Seek funding for air quality projects in Bromley to reduce emissions.
- **Action point 6** - Compile and submit Local Air Pollution Prevention and Control (LAPPC) data return in line with the statutory reporting deadline.
- **Action point 7** - Review Air Quality Focus Area's in the Borough – at Elmers End gyratory and Widmore Road/Bromley High Street
- **Action point 8** - Work towards the World Health Organization (WHO) interim guideline levels for NO₂ and PM_{2.5}.

5.2 Reducing emissions from existing buildings and new developments

We will mitigate and minimise emissions from both existing buildings and from new development using a combination of policy, partnership working, and specific projects and interventions, principally through use of the planning system. There has been much attention in terms of air quality policy focused on transport emissions; policies to increase modal shift to active travel and Mayoral policies to increase low emissions vehicles, meaning that as transport emissions decrease, emissions from buildings proportionally become a dominant source. Bromley is committed to reducing emissions from the built environment by implementing Air Quality Neutral policy. The current and emerging Local Plan provides the policy background as to how we will reduce emissions from new Development. The work on reducing emissions from buildings (both existing and within new development) will be in collaboration with measures to reduce greenhouse gas emissions. In addition, policy SI1 in the London Plan includes the concept of 'Air Quality Positive' which aims to ensure that major new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to pollution. Other areas for improvement include drawing on planning policy to ensure Green Infrastructure and local green space solutions form part of new developments, to maximise improvements to air quality and where relevant, reduce exposure.

Our actions

- **Action point 9** - Ensure that all Part B (Environmental Permitting) processes are inspected and risk assessed in line with statutory requirements.
- **Action point 10** - Ensure enforcement action is taken for any breach of LAPPC permit.
- **Action point 11** - Assess all relevant planning applications for their air quality impact and condition as appropriate.

Priority action:

- **Action point 12 - Ensure emissions from construction are minimised via the requirement of a Construction Environmental Management Plan (CEMP) for all major developments.**
- **Action point 13** - Ensure emissions from construction are minimised via enforcement of CEMP's.
- **Action point 14** - Ensure Non-Road Mobile Machinery (NRMM) air quality policies are applied/conditioned.
- **Action point 15** - Ensuring CHP and biomass air quality policies applied.

Priority action:

- **Action point 16 - Ensure Air Quality Neutral guidance is applied.**

Priority action:

- **Action point 17 - Ensuring adequate, appropriate, and well located green space and infrastructure is included in new developments.**
- **Action point 18** - Review and update the Borough's Smoke Control Orders.
- **Action point 19** - Ensure that Smoke Control Areas are appropriately promoted and enforced.
- **Action point 20** - Ensure Chimney Height Approval applications are issued within the statutory timeframe.
- **Action point 21** - Promote and deliver energy efficiency retrofitting projects in workplaces and homes to replace old boilers/top-up loft insulation in combination with other energy conservation measures.

Priority action:

- **Action point 22 - Large developments (i.e. those likely to create a significant number of trips) will, where relevant, enter into an agreement to submit and implement acceptable Construction Logistics Plans, and Delivery/ Servicing Plans. Consideration will be given to re- organisation of freight to support consolidation (or micro- consolidation) of deliveries, by setting up or participating in new logistics facilities, and/or requiring that council suppliers participate in these.**

5.3 Cleaner transport

Reducing emissions from transport is a key focus area for the AQAP, achievable through transport policy and projects which encourage model shift towards active modes of travel (walking and cycling) and public transport. This is supported by the transport objectives outlined in the LIP, which support the Mayor's overall objective of increasing sustainable transport mode share, thereby reducing car usage. A number of actions within this AQAP support model shift to cleaner vehicles, such as through the increase of electric vehicle charging infrastructure and a shift in Bromley Council's own vehicle fleet to low emissions vehicles. Beyond this, a number of other actions are suggested to encourage Active Travel and minimise emissions (e.g. Road closures for community events, Anti-Idling Campaigns), the reallocation of road space, to support alternative modes of travel is supported e.g. restricting parking on congested high streets and busy roads to improve bus journey times, improving cycling experience, and reducing emissions caused by congested traffic.

It is recognised that not all of the population in Bromley will be able to switch to active travel, and not all trips will be suitable. We will therefore also work towards increasing the proportion of electric vehicles in the Borough, largely through the implementation of infrastructure to encourage residents and visitors to use electric vehicles. Other actions for the improvement of air quality will also be promoted such as the Travel for Life programme and Air Quality in Schools, which encourages emission reductions and minimising exposure.

Our actions

Priority action

- **Action point 23 - Discourage unnecessary idling by taxis, coaches and other vehicles (e.g. through anti-idling campaigns or enforcement activity).**
- **Action point 24 - Road closures for community events (with no vehicles on certain days) and similar initiatives (e.g. The Big Lunch Event)**

Priority action:

- **Action point 25 - Installation of residential electric charge points.**
- **Action point 26 - Installation of rapid chargers to help enable the take up of electric taxis, cabs and commercial vehicles (in partnership with TfL and/or OLEV).**

Priority action:

- **Action point 27 - Sharing of road space; reducing parking at accessible destinations and/or restricting parking on congested high streets and busy roads to improve bus journey times, cycling experience, and reduce emissions caused by congested traffic.**
- **Action point 28 - Provision of infrastructure to support walking and cycling.**
- **Action point 29 - Increase the number of hydrogen, electric, hybrid, bio-methane and cleaner vehicles in the Boroughs' fleet.**
- **Action point 30 - Accelerate uptake of new Euro VI vehicles in Borough fleet.**
- **Action point 31 - Drivers of vehicles in Borough's Own Fleet must undertake a Competence check,**

as well as adhere to Drivers Code of Conduct, which includes driving with consideration of Environment Best Practice.

- **Action point 32** - Provision of Electric Refuse Collection Vehicle (eRCV), and its ongoing operation.

5.4 Public health and awareness raising

Awareness raising in Bromley is centred around educating people about the air quality issue, which could be through encouraging behaviour change to more active modes of travel or through increasing awareness to minimise/reduce exposure to poor air quality (such as reducing solid fuel burning). The impacts of awareness raising projects on behaviour can be difficult to measure, however, messaging around increasing public awareness of air pollution align with wider Council behaviour change priorities: i.e. the importance of supporting healthy lifestyles through increased walking and cycling. To this effect, working collaboratively with Public Health colleagues is particularly important as a way to increase awareness around air pollution. As well, health professionals are trusted and independent voices who are able to help us reach out to members of the community that are most adversely affected by air pollution, such as older people, and those who are hardest to reach. Other examples are building on work which is currently being undertaken in schools and the use of tools to communicate air pollution levels, in order to encourage behaviour change for the improvement of air quality that people experience.

Our actions

- **Action point 33** - Dust Management Plans at Waste Transfer Stations in place and implemented.
- **Action point 34** – The Bromley Health Protection Board is chaired by the Director of Public Health. Updates and issues related to air quality are presented to the board by the Public Protection and Environmental Health Team. The Health Protection Board reports to the Health and Wellbeing Board and provides an annual report, which includes a review of any relevant air quality implications.
- **Action point 35** – The Public Health team will continue to raise awareness on the impacts to health from air quality through engagement with local stakeholders. E.g. sharing messages to professionals on air quality campaigns through GP Bulletin and via school circulars.
- **Action point 36** - To enhance coordination with Public Health, air quality is recognised as a component of the Health Protection team portfolio, overseen by a Consultant in Public Health and Senior Health Protection Practitioner.
- **Action point 37** - The Air Quality Action Plan and Annual Status Reports to be brought to the Health Protection Board, chaired by the Director of Public Health and reported in the annual health protection report to the Health and wellbeing board.
- **Action point 38** - Ensure Environment and Public Protection colleagues attend Health Protection Board so that colleagues across Public Health Department and EPP Department have opportunity to identify areas to work jointly on air quality issues and disseminate relevant information to their teams.
- **Action point 39** - Promote and increase awareness of air quality monitoring tools among stakeholders including GPs and other health professionals. This initiative should particularly target vulnerable individuals and those with health conditions that may be adversely affected by poor air quality.

Priority action

- **Action point 40 - Encourage schools to join the TfL Travel for Life programme accredited travel planning programme by providing information on the benefits to schools and supporting the implementation of such a programme.**
- **Action point 41** - Air quality projects in schools.
- **Action point 42** - Inclusion of Air Quality within 'Question bank' for Social Value.

5.5 Localised solutions

These seek to improve the environment of neighbourhoods through a combination of measures including, green infrastructure and maximizing benefits from energy efficiency measures.

Our actions

- **Action point 43** - Green Infrastructure – retain and enhance green infrastructure, particularly in relation to new development.

Priority action:

- **Action point 44 - Green Infrastructure – tree planting subject to available external funding.**
- **Action point 45** - Maximising co-benefits from energy efficiency measures, e.g. energy efficiency in Bromley's buildings, local area energy planning.

As a local authority, we cannot tackle the problem of air pollution alone. Many of the contributors to pollution in Bromley are not within our control, and in many cases the measures which have the greatest impact need to be implemented at a wider scale. This is particularly the case for particulate matter where a large proportion of the pollutant concentrations in Bromley will be derived from outside of the Borough.

Although the measures outlined in this Action Plan are those we have an influence over, collaborative efforts across London and nationwide should provide a greater impact in improving air quality. We will also maintain close working relationships with planning, transport, public health and carbon management colleagues on a day-to-day basis.

6. Air Quality Action Plan Matrix

As part of its statutory London Local Air Quality Management duties, the GLA has produced an air quality matrix with 38 actions for Boroughs to consider within the action planning process. Bromley is committed to taking forward 25 of the 38 actions in this matrix, along with additional actions under each theme tailored to Bromley’s local context. GLA actions that the Council are not pursuing in this AQAP are outlined in Appendix B.

Table 4 contains Bromley’s Air Quality Action Plan Matrix, which sets out full details of each action, including the specific measures that will be delivered over the lifetime of this Plan.

6.1 Air quality monitoring and statutory duties

Table 4 - Air Quality Action Plan

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
1*	Maintain the borough's automatic monitoring site at Harwood Avenue and 32 diffusion tubes located throughout the Air Quality Management Area	Environmental Protection	££	No emissions/ concentrations benefits but critical in terms of understanding emissions and concentrations and the impact of action taken	Ongoing	All monitors maintained and over 90% data capture	Details of our monitoring can be found on the Air Quality England website
2*	Review the monitoring network to ensure that it is still fit for purpose and add additional monitoring if required	Environmental Protection	£	No emissions/ concentrations benefits but critical in terms of understanding emissions and concentrations	31/12/2027	Review the air quality monitoring network to assess whether it remains fit for purpose by 31st December 2027.	Details of our monitoring can be found in our air quality annual status reports on the Council website
3*	Compile an Annual Status Report (ASR) on air quality in Bromley and publish on our website	Environmental Protection	£	No emissions/ concentrations benefits but critical in terms of understanding emissions and concentrations and the impact of action taken	Ongoing	- ASR submitted yearly to GLA by their reporting deadline - Published on our website following GLA approval	Details of our ASR reports can be found in our air quality annual status reports on the Council website

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
4*	Where appropriate, use planning obligations to secure funding from developers for monitoring compliance checks on major and/or sensitive sites	Environmental Protection/Planning	££	Some improvements, but benefits limited to specific locations of development and time which development is taking place	Ongoing	Number of Section 106 agreements for Construction Environmental Impact Monitoring	
5*	Seek funding for air quality projects in Bromley to reduce emissions	Environmental Protection	££	Some improvements, but benefits limited to specific location of project, unless a Boroughwide scheme	Ongoing	Seek external funding for air quality offsets and initiatives, subject to available staff and financial resources.	
6*	Compile and submit Local Air Pollution Prevention and Control (LAPPC) data return in line with the statutory reporting deadline	Environmental Protection	£	No emissions/ concentrations benefits but critical in terms of understanding emissions and concentrations and the impact of action taken	Ongoing	LAPPC data return submitted in line with Defra's statutory reporting deadline	
7*	Review Air Quality Focus Area's in the Borough – at Elmers End gyratory and Widmore Road/Bromley High Street	Environmental Protection	£	No emissions/ concentrations benefits but critical in terms of understanding emissions and concentrations and the impact of action taken	31/12/2031	Review of AQFA's conducted by 31/12/3031	

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
8*	Work towards the World Health Organization (WHO) interim guideline levels for NO ₂ and PM _{2.5}	Environmental Protection	££	No emissions/ concentrations benefits but critical in terms of understanding emissions and concentrations and the impact of action taken	31/12/2031	Undertake an annual assessment of monitored and modelled NO ₂ and PM _{2.5} concentrations against the WHO Interim Targets, with the results reported in the Annual Status Report (ASR)	

£ = <£10K, ££ = £10K – £500k, £££ = £500k - £1m, ££££ = >£1m.

* Indicates additional measures to the GLA matrix

6.2 Reducing emissions from existing buildings and new developments

Table 4B - Air Quality Action Plan

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
9*	Ensure that all Part B (Environmental Permitting) processes are inspected and risk assessed in line with statutory requirements	Environmental Protection	£	Some improvements, but benefits limited to specific locations of installation	Ongoing	100% of Part B processes are inspected and risk assessed in line with statutory requirements	
10*	Ensure enforcement action is taken for any breach of LAPPC permit	Environmental Protection	£	Some improvements, but benefits limited to specific locations of installation	Ongoing	Number of enforcement notices issued for all breaches of LAPPC permit. 100% in all appropriate cases.	

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
11*	Assess all relevant planning applications for their air quality impact and condition as appropriate	Environmental Protection/Planning	£	Some improvements, but benefits limited to specific locations of development and time which development is taking place	Ongoing	- Assess 100% of relevant planning applications for their air quality impact - Ensure 100% of relevant planning applications include mandatory NRMM planning conditions - Ensure 100% of relevant planning applications include the ultra-low NO_x boiler planning condition Assess 100% of relevant planning applications for their air quality neutral impact and where applicable, air quality positive impact	Further information on air quality impacts is contained within Bromley's Local Plan, as well as regional and national planning policy. Planning Conditions: Pollution Team's requirements for planning applications are available on the Council's website.

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
12	Ensure emissions from construction are minimised via the requirement of a Construction Environmental Management Plan (CEMP) for all major developments	Planning/ Environmental Protection	£	Some improvements, but benefits limited to specific locations of development and time which development is taking place	Ongoing	100% of relevant developments implementing a CEMP	Undertaken through reviewing planning applications, with conditions applied in relation to GLA SPG on the 'Control of Dust and Emissions from Construction and Demolition'. Planning Conditions: Pollution Team's requirements for planning applications are available on the Council's website
13*	Ensure emissions from construction are minimised via enforcement of CEMP's	Planning/ Environmental Protection	£	Some improvements, but benefits limited to specific locations of development and time which development is taking place	Ongoing	100% of service requests investigated relating to dust emissions from construction sites with a CEMP in place	
14	Ensure Non-Road Mobile Machinery (NRMM) air quality policies are applied/conditioned	Planning/ Environmental Protection	£	Some improvements, but benefits limited to specific locations of development and time which development is taking place	Ongoing	100% of relevant planning applications conditioned with NRMM requirements	LBB are part of a London-wide enforcement project. Condition applied to developments which include construction.

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
15	Ensuring CHP and biomass air quality policies applied	Planning/ Environmental Protection	£	Prevents increased emissions/additional sources of pollution	Ongoing	100% compliance of relevant planning applications	LBB do not have CHP or biomass issues, but if proposed through planning system, a condition would be applied.
16	Ensure Air Quality Neutral guidance is applied	Planning/ Environmental Protection	£	Guidance designed to reduce general increase in emissions across London	Ongoing	AQN guidance applied to 100% of relevant applications	AQN reviewed through Air Quality Assessments for planning applications. In cases where applications are not AQN, review with planners re: measures required or an offsetting payment.
17	Ensuring adequate, appropriate, and well located green space and infrastructure is included in new developments	Planning	£	Not quantifiable, but increasing greenspace will encourage walking and cycling, and in some cases reduce exposure to pollution	Ongoing. Existing Local Plan adopted January 2019, so current policies apply to the timespan of the Local Plan. Current Local Plan is	100% of relevant planning applications	In addition to the London Plan, several policies from the adopted Bromley local plan (2019) aim to retain and enhance green infrastructure including Policy 37 General Design of Development and G1 - G10

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
					under review, however new Local Plan, once adopted will include similar policies (unknown at present) which would have similar benefit to air quality.		(designated green spaces, trees and nature conservation). The Local Plan is supported by the Urban Design Guide SPD (July 2023) which highlights the importance of green infrastructure and urban greening within new development. The Local Plan is being reviewed. The last consultation document 'Direction of Travel' in 2025 set out the Council's preferred policy direction going forward, including continued support for the protection of and enhancement of open space, requirements for

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
							the Urban Greening Factor in new developments and statutory Biodiversity Net Gain requirement of 10% for new developments.
18*	Review and update the Borough's Smoke Control Orders	Environmental Protection	£	Enhances order and protections afforded under SCO	31/12/2027	Updated single smoke control order in place	

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
19	Ensure that Smoke Control Areas are appropriately promoted and enforced	Environmental Protection	£	Potential reduction in emissions for PM _{2.5} from solid fuel burning.	Ongoing	100% of service requests investigated Details of any promotion	Smoke Control Area covers most of the Borough but not all. Procedure in place for enforcement. Trading Standards enforce the Domestic Solid Fuel Regulations. Joined the Mayor's Air Quality Fund London Wood Burning Project. Details of Clean Air Night shared with medical practitioners via Public Health team.
20*	Ensure Chimney Height Approval applications are issued within the statutory timeframe	Environmental Protection	£	Some improvements, benefits limited to specific location of installation	Ongoing	Assess 100% of chimney height applications received in accordance with relevant guidance and statutory requirements	

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
21	Promote and deliver energy efficiency retrofitting projects in workplaces and homes to replace old boilers/top-up loft insulation in combination with other energy conservation measures.	Carbon Management	££	Potentially large reductions in building related emissions, particularly where heat pumps etc fitted in place of inefficient gas boilers	Ongoing	Details of promotion and schemes reported in ASR	Promoting and delivering energy efficiency retrofitting projects in workplaces and homes. If opportunities arise to implement additional energy efficiency and decarbonisation measures within the LBB operational estate, LBB will explore all options, assess and pursue engagement with the GLA RE:FIT5 framework or its successor to deliver energy efficiency works, ensuring all actions are delivered within the available financial envelope.

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
22*	Large developments (i.e. those likely to create a significant number of trips) will, where relevant, enter into an agreement to submit and implement acceptable Construction Logistics Plans, and Delivery/ Servicing Plans. Consideration will be given to re-organisation of freight to support consolidation (or micro- consolidation) of deliveries, by setting up or participating in new logistics facilities, and/or requiring that council suppliers participate in these.	Planning/ Highways/ Environmental Protection	£	Some improvements, but benefits limited to specific locations of Developments being undertaken at the same time, and where these Developments are taking place.	Ongoing	100% of all relevant developments to submit and implement an acceptable construction logistics plan	There are a number of examples where this has recently successfully been implemented.

£ = <£10K, ££ = £10K – £500k, £££ = £500k - £1m, ££££ = >£1m.

* Indicates additional measures to the GLA matrix

6.3 Cleaner transport

Table 4C - Air Quality Action Plan

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
23	Discourage unnecessary idling by taxis, coaches and other vehicles (e.g. through anti-idling campaigns or enforcement activity)	Transport	£	Emissions and concentration benefits will be localised, and with minimal intervention per year, unlikely to affect annual mean concentrations, but useful for raising awareness	Ongoing	Demonstrated through the Anti Idling campaign focused around schools	
24	Road closures for community events (with no vehicles on certain days) and similar initiatives (e.g. The Big Lunch Event)	Transport	£	Dependent on size, number of events and frequency – while there will be emissions reductions this is difficult to quantify. Nevertheless, this is a further case of Leading by example	Ongoing	Assess 100% of applications received for road closures for community events and similar initiatives	Details for road closures for special events are available on our website here: Road closures for special events - Street parties and public events
25	Installation of residential electric charge points	Transport	££	A large enough shift to zero emission cars across Bromley will provide measurable reductions in concentrations, but would be due to overall package of measures encouraging shift to EV, including at London level	Bromley will be going to market in 2026 with the three other London Boroughs in LEVI partnership to procure a supplier for on street EV charge points.	Number of charge points within Bromley (charging stats by Borough available from DfT website)	Bromley has also launched the gully charging scheme for applicable residents . Moderate cost to Council (OZEV grants available and can be funded through LIP)

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
26	Installation of rapid chargers to help enable the take up of electric taxis, cabs and commercial vehicles (in partnership with TfL and/or OLEV)	Transport	££	A large enough shift to zero emission cars across Bromley will provide measurable reductions in concentrations, but would be due to overall package of measures encouraging shift to EV, including at London level.	Ongoing. Bromley are in early discussions with TfL and their supplier to see if there are suitable sites in Bromley for their rapid charging hubs for all users.	Number of charge points within Bromley (charging stats by borough available from DfT website)	Currently, Bromley has 13 rapid charging points, 12 at Stockwell Close Multi-storey car park) and 1 in Flamingo Park on the A20. Another rapid charging point is located just outside of the Bromley border (in West Wickham, Croydon), still well situated for Bromley residents. Moderate cost to Council (mainly delivered by private sector).

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
27	Sharing of road space; reducing parking at accessible destinations and/or restricting parking on congested high streets and busy roads to improve bus journey times, cycling experience, and reduce emissions caused by congested traffic	Transport	££	Emissions/concentration benefits will depend on the level to which prioritisation of road space is implemented. A package of measures to encourage modal shift to active travel could provide measurable reductions in concentrations, but would be due to an overall package	Ongoing as part of the Local Plan implementation	Further road space re-prioritisation schemes implemented	Examples across Bromley include Double yellow lines at junctions or in narrow places (lots of schemes across Borough), CPZs in some residential areas, bus priority measures (e.g. one of Departmental targets is about bus delays (delays to be less than 1 minute) – Performance Indicator within Bromley Environmental Portfolio Plan. Ongoing programme of improvements and funding available from TfL outside of the LIP programme to support new bus lanes (currently progressing with Anerley Hill).

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
28	Provision of infrastructure to support walking and cycling	Transport	££	As above, a package of measures to encourage modal shift to active travel could provide measurable reductions in concentrations, but would be due to an overall package	Ongoing as part of the Local Plan implementation and Local Implementation Plan	Number of schemes implemented to support walking and cycling. Proportions of trips made by walking and cycling. Performance indicators in Bromley Environmental Portfolio Plan. Identification of schemes each financial year to implement the following year.	Active travel information is available on the Council website, including cycle routes in Bromley, cycle training sessions, scooter training, informal crossing points and pedestrian refuges. Initiatives such as tactile pavements to make it easier to cross, new zebra crossings to make walking easier, Parallel zebra crossings for bikes and pedestrians, new signalised crossings.
29	Increase the number of hydrogen, electric, hybrid, bio-methane and cleaner vehicles in the Boroughs' fleet	Fleet	£ - ££	Very few vehicles, therefore minimal improvements (but does demonstrate leading by example)	Ongoing	Number of Council vehicles replaced with most viable low-emission vehicles when they reach the end of their service life	Very small Council fleet (24 vehicles). Therefore, no fleet strategy but Council have switched to leasing, so easier to replace vehicles relatively quickly. Noteworthy that number of vehicles in fleet are decreasing.

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
30	Accelerate uptake of new Euro VI vehicles in Borough fleet	Fleet	£ - ££	Few vehicles, therefore minimal improvements (but does demonstrate leading by example)	30 th April 2028	All Euro 5 vehicles will be replaced by 2027/28, other than 1 snow moving vehicle which will still be Euro 5)	Worth noting that this is only relevant to heavier vehicles, which is contracted out by the Highways team. There is a fleet of gritters (10 – which will be reducing to 7 next year). EV gritters not routinely available although do exist.
31	Drivers of vehicles in Borough's Own Fleet must undertake a Competence check, as well as adhere to Drivers Code of Conduct, which includes driving with consideration of Environment Best Practice	Fleet	£	Few vehicles, therefore minimal improvements (but does demonstrate leading by example)	Ongoing	100% of new drivers to undertake a competence check as well as adhere to Drivers Code of Conduct, which includes driving with consideration of Environment Best Practice	
32*	Provision of Electric Refuse Collection Vehicle (eRCV), and its ongoing operation	Waste	£	Emissions and concentration benefits minimal, but useful for raising awareness	Operational from October 2025.	Review of feedback from the use of the eRCV annually	Council will evaluate success of first vehicle before any extension of the scheme is decided. Vehicle provided by Contractor and on-going running/ maintenance costs covered by contract.

£ = <£10K, ££ = £10K – £500k, £££ = £500k – £1m, ££££ = >£1m.

** Indicates additional measures to the GLA matrix*

6.4 Public health and awareness raising

Table 4D - Air Quality Action Plan

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
33*	Dust Management Plans at Waste Transfer Stations in place and implemented	Waste	£	Emissions and concentration benefits will be localised and could be ascertained from local PM ₁₀ monitoring (where before and after available). Useful for raising awareness	Ongoing	Up-to-date Dust Management Plans at Waste Transfer Stations in place 100% of control measures adhered to	As part of Contractor's license (regulated by EA), Contractor is required to undertake control measures to minimise dust emissions at their Waste Transfer sites – specifically relating to the Control, monitoring and reporting on dust, fibres and particulates.

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
34	The Bromley Health Protection Board is chaired by the Director of Public Health. Updates and issues related to air quality are presented to the Board by the Public Protection and Environmental Health team. The Health Protection Board reports to the Health and Wellbeing Board and provides an annual report, which includes a review of any relevant air quality implications.	Public Health/ Public Protection	£	Any reduction in emissions and concentrations resulting from this measure would be indirect and unquantifiable, but enhanced co-ordination will benefit all air quality initiatives.	Ongoing collaborative working	Public Protection attendance at Health Protection Board meetings to provide air quality updates	
35	The Public Health team will continue to raise awareness on the impacts to health from air quality through engagement with local stakeholders. E.g. sharing messages to professionals on air quality campaigns through GP Bulletin and via school circulars.	Public Health	£	Any reduction in emissions and concentrations resulting from this measure would be unquantifiable, but enhanced co-ordination will benefit all air quality initiatives.	Ongoing collaborative working	Inclusion of specific health input into specific policies and projects	

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
36	To enhance coordination with Public Health, air quality is recognised as a component of the Health Protection team portfolio, overseen by a Consultant in Public Health and Senior Health Protection Practitioner.	Public Health	£	Any reduction in emissions and concentrations resulting from this measure would be unquantifiable, but enhanced co-ordination will benefit all air quality initiatives.	Ongoing collaborative working	Ongoing promotion of schemes/ campaigns for the improvement of air quality, and general awareness raising.	
37	The Air Quality Action Plan and Annual Status Reports to be brought to the Health Protection Board, chaired by the Director of Public Health and reported in the annual health protection report to the Health and Wellbeing board.	Public Health	N/A	N/A	Annually for ASRs, 5 yearly for AQAPs	AQAP and ASR's brought to Health Protection Board and reported in the annual health protection report to the Health and Wellbeing board	

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
38	Ensure Environment and Public Protection colleagues attend Health Protection Board so that colleagues across Public Health Department and EPP Department have opportunity to identify areas to work jointly on air quality issues and disseminate relevant information to their teams.	Public Health/ Environmental Protection Team	N/A	N/A	Ongoing collaborative working	Inclusion in governance process for LAQM reports	
39	Promote and increase awareness of air quality monitoring tools among stakeholders including GPs and other health professionals. This initiative should particularly target vulnerable individuals and those with health conditions that may be adversely affected by poor air quality.	Public Health	£	May encourage active travel, but more likely to reduce exposure.	Ongoing	Promotional activities and outreach programme undertaken	

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
40	Encourage schools to join the TfL Travel for Life programme accredited travel planning programme by providing information on the benefits to schools and supporting the implementation of such a programme	Traffic and Road Safety	£	Increase in active travel will have benefits for emissions reductions from travel (and co-benefits for health directly). Not easily quantifiable, but the impacts of School Streets has been quantified and shown improvements.	Ongoing	Maintain the number of schools with 'Gold' status in the TfL's Travel for Life programme	Bromley has more 'Gold' schools in TfL's Travel for Life programme than any other Borough (1 Silver school and 86 Gold status schools). Gold status is the highest recognition in the Travel for Life programme and shows that a school is a leading example of sustainable, active and safe travel. It recognises long term commitment, measurable impact, and embedded good practice across the whole school community.

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
41	Air quality projects in schools	Traffic and Road Safety	£	Increase in active travel around schools will have benefits for emissions reductions from travel (and co-benefits for health directly). Not easily quantifiable, but the impacts of School Streets has been quantified and shown improvements in Brent, Enfield and Lambeth.	Ongoing	A minimum of three schools actively engaged in air quality projects	There are currently three schools under the School Streets scheme. Bromley also runs an anti-Idling campaign.
42*	Inclusion of Air Quality within 'Question bank' for Social Value	Procurement	£	Dependent on size and number of Social Value projects which include measures to benefit Air Quality – while there will be emissions reductions this is difficult to quantify. Nevertheless, this is a further case of Leading by example	Ongoing	Number of Social Value projects which include Air Quality as beneficiary - and details of how	Inclusion within Social Value procurement, to be included within 'Supplier Help' section, e.g. Positive environmental benefits, including improvement of air quality and carbon reduction. If AQAP is a more significant aspect of the procurement, it would be expected that the commissioners/ procurement lead should draft a

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
							more specific question for positive environmental benefits, and/or to ensure it is covered by the specification and tenderers' methodology.

£ = <£10K, ££ = £10K – £500k, £££ = £500k - £1m, ££££ = >£1m.

* Indicates additional measures to the GLA matrix

6.5 Localised solutions

Table 4E - Air Quality Action Plan

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
43	Retain and enhance Green Infrastructure, particularly in relation to new development	Planning	£	Not quantifiable, but increasing greenspace will encourage walking and cycling, and in some cases reduce exposure to pollution	Ongoing	Number of planning applications which have conditions relating to relevant policies	In addition to the London Plan, several policies from the adopted Bromley local plan (2019) aim to retain and enhance green infrastructure including Policy 37 General Design of Development and G1 - G10 (designated green spaces, trees and nature conservation). The Local Plan is supported by the Urban Design Guide SPD (July 2023) which highlights the importance of green infrastructure and urban greening within new development.

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
							As noted in Action 5, the Local Plan is being reviewed. The last consultation document 'Direction of Travel' in 2025 set out the Council's preferred policy direction going forward, including continued support for the protection of and enhancement of open space, requirements for the Urban Greening Factor in new developments and statutory Biodiversity Net Gain requirement of 10% for new developments.
44*	Green Infrastructure – tree planting subject to available external funding.	Green Space	££	Not quantifiable, but maintaining greenspace will encourage walking and cycling, and in some cases reduce exposure to pollution	Ongoing	Maintain over 60,000 publicly owned registered trees in the Borough	Further information regarding the Council's Treemendous scheme can be found on the Council website

Action ID	Action name and description	Responsibility	Cost	Expected benefit	Timescale	Outputs, Targets and KPIs	Further information
45*	Maximising co-benefits from energy efficiency measures, e.g. energy efficiency in Bromley's buildings, local area energy planning	Carbon Management	££	Potentially large reductions in building related emissions from Bromley Buildings' and general local area planning, otherwise initiatives will have smaller, less quantifiable impacts but would raise awareness.	Ongoing	Co-benefits from energy efficiency measures will be documented in the ASR Maintain climate action score cards in so far as this relates to co-benefits	Numerous examples of projects and initiatives which sit under other disciplines within the Council which have co-benefits with air quality, e.g. Improving energy efficiency within Bromley's buildings – e.g. Walnuts and West Wickham Leisure Centres, work towards introducing District Heating Networks within the Borough.

£ = <£10K, ££ = £10K – £500k, £££ = £500k - £1m, ££££ = >£1m.

* Indicates additional measures to the GLA matrix

Appendix A - Response to Consultation

– to be completed post consultation

Table 5 - Summary of responses to consultation and stakeholder engagement on the AQAP

Consultee	Category	Response

Appendix B - Reasons for Not Pursuing Action Plan Measures

- to be discussed with the GLA prior to finalisation

The GLA Air Quality Action Matrix is available here: https://www.london.gov.uk/sites/default/files/air_quality_action_matrix.pdf

Table 6 - Action plan measures not pursued and the reasons for that decision

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
Public Health and awareness raising (GLA action point 10)	Director of Public Health to have responsibility for ensuring their Joint Strategic Needs Assessment (JSNA) has up to date information on air quality impacts on the population	The Public Health team at Bromley are in the process of agreeing JNSA priorities for 2026, and feel it's not feasible to commit to an Action such at this at this stage.
Public Health and awareness raising (GLA action point 14)	Engagement with businesses	The Council not currently specifically engaging with businesses in the Borough on air quality, although working with businesses on improving sustainability through the commitment to "host business support events in partnership with external funders" which should also have air quality benefit.
Delivery servicing and freight (GLA Action point 18)	Update local authority Procurement policies to include a requirement for suppliers with large fleets to have attained silver Fleet Operator Recognition Scheme (FORS) accreditation	Not currently a requirement within procurement policies and no plans to introduce it. Commitment within Sustainable Procurement Policy, which stipulates that environmental implications must be considered and that the Council must seek to minimise negative impacts. Appendices 1 and 2 give officers guidance on identifying impacts, which include emissions and energy use. The policy refers to the aims and targets of the 'Making Bromley Even Better' Ambition 4 ("For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future"), which includes: "Implement Bromley's Air Quality Action Plan, including increasing access to electric vehicle charging points and tackling vehicle 'idling' through use of fixed penalty notices, and making best use of grants from the Government and other sources to increase the network of electric charging points across the borough."

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
Delivery servicing and freight (GLA Action point 19)	Update Procurement policies to ensure sustainable logistical measures are implemented (and include requirements for preferentially scoring bidders based on their sustainability criteria)	As above
Delivery servicing and freight (GLA Action point 20)	Re-organisation of freight to support consolidation (or micro-consolidation) of deliveries, by setting up or participating in new logistics facilities, and/or requiring that council suppliers participate in these	Consolidation centres are difficult to run from economic point of view, particularly at a local level with regards to current expectations around speed of delivery. For these reasons, this Action will not be taken forward at this time. Action not as relevant in outer London as central.
Delivery servicing and freight (GLA Action point 21)	Virtual Loading Bays and priority loading for ultra-low emission delivery vehicles	Virtual Loading Bays are not relevant for Bromley.
Borough fleet actions (GLA Action point 22)	Join the Fleet Operator Recognition Scheme (FORS) for the borough's own fleet and obtain Gold accreditation	Bromley's Fleet is small (22 vehicles, predominantly cars, with some vans), of which 68% are low emission vehicles (electric/hybrid), making it unviable for the Council to pursue this measure.
Localised solutions (GLA Action point 27)	Low Emission Neighbourhoods (LENs)	LENs not being implemented in Bromley, but some School Streets are in place .
Cleaner transport (GLA Action point 29)	Speed control measures e.g. lowering the legal speed limit to 20mph in built up residential areas or implementation of Variable, advisory speed limits	No plan to extend number of 20 mph zones implemented in Borough. Variable, advisory speed limits more favourable politically.
Cleaner transport (GLA Action point 30)	Increasing the proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs	Car clubs signposted on the Council website . One car club operator (Enterprise) – of which eight are Euro VI (no electric and no hybrid vehicles).
Cleaner transport (GLA Action point 32)	Free or discounted parking charges at existing parking meters for zero emission cars	There are no plans for differential parking charges within Bromley.
Cleaner transport (GLA Action point 33)	Free or discounted residential parking permits for zero emission cars	There are no plans for differential parking charges within Bromley.
Cleaner transport (GLA Action point 34)	Surcharge on diesel vehicles below Euro 6 standards for Resident and Controlled Parking Zone permits	There are no plans for differential parking charges within Bromley.